PREA Facility Audit Report: Final

Name of Facility: Ford County Jail Facility Type: Prison / Jail Date Interim Report Submitted: NA Date Final Report Submitted: 09/16/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	
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.	
Auditor Full Name as Signed: Lauren Fish	Date of Signature: 09/16/ 2023

AUDITOR INFORMATION	
Auditor name:	Fish, Lauren
Email:	LaurenFish23@hotmail.com
Start Date of On- Site Audit:	06/28/2023
End Date of On-Site Audit:	06/29/2023

FACILITY INFORMATION	
Facility name:	Ford County Jail
Facility physical address:	235 North American Street, Paxton, Illinois - 60957
Facility mailing address:	

Primary Contact	
Name:	Stacie Bruens
Email Address:	sbruens@fcsheriff.com
Telephone Number:	217 379 2324

Warden/Jail Administrator/Sheriff/Director	
Name:	Chad Johnson
Email Address:	cjohnson@fcsheriff.com
Telephone Number:	217 379 9470

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

Facility Health Service Administrator On-site	
Name:	Mark Brake
Email Address:	mark.brake@gmail.com
Telephone Number:	217 379 2324

Facility Characteristics	
Designed facility capacity:	61
Current population of facility:	44
Average daily population for the past 12 months:	27
Has the facility been over capacity at any point in the past 12 months?	No

Which population(s) does the facility hold?	Both females and males
Age range of population:	18-99
Facility security levels/inmate custody levels:	low-high
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	13
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	3
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Ford County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	235 North American Street , Paxton, Illinois - 60957
Mailing Address:	
Telephone number:	2173792324

Agency Chief Executive Officer Information:	
Name:	Chad Johnson
Email Address:	cjohnson@fcsheriff.com
Telephone Number:	217 379 9740

Agency-Wide PREA Coordinator Information

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:		
0		
Number of standards met:		
45		
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:	2023-06-28	
2. End date of the onsite portion of the audit:	2023-06-29	
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?	 Yes No 	
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Crisis Resource and Counseling Center (CRCC)	
AUDITED FACILITY INFORMATION		
14. Designated facility capacity:	61	
15. Average daily population for the past 12 months:	27	
16. Number of inmate/resident/detainee housing units:	1	
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	 Yes No 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:	48
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:	1
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:	0
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:	0

44. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
46. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	4
47. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
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:	17
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:	0

 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: 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: 	2 1 staff on each shift assigned to Dispatch.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	5
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	10
54. Select which characteristics you	Age
considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	Race
	Ethnicity (e.g., Hispanic, Non-Hispanic)
	Length of time in the facility
	Housing assignment
	Gender
	Other
	None None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	On the first day of the onsite audit, the facility provided a list of all inmates with housing, age, race, gender and booking date. The auditor randomly selected a sample of interviewees, making sure to choose a diverse group of inmates from different housing blocks, ages, genders and length of time in the facility.

56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	 Yes No 	
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.	
Targeted Inmate/Resident/Detainee Interviews		
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	3	
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".

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:	1
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:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, documentation reviewed onsite, and discussion with staff and other inmates
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, discussion with staff and other inmates
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:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, discussion with staff and other inmates
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:	1
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, documentation reviewed onsite, and discussion with staff and other inmates

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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, documentation reviewed onsite, and discussion with staff and other inmates
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, documentation reviewed prior to the onsite audit and documentation reviewed onsite, and discussion with staff and other inmates

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:	1
69. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	 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. The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Determined based on information provided in the PAQ, documentation reviewed onsite, and discussion with staff and other inmates
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	Due to the facility's small population, there were only a limited number of inmates in the special populations for targeted interviews.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	4

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	 Length of tenure in the facility Shift assignment Work assignment Rank (or equivalent) Other (e.g., gender, race, ethnicity, languages spoken) None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	Yes
a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)	 Too many staff declined to participate in interviews. Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles). Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews. Other
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):	All staff who were working on the dates of the onsite audit were interviewed. Due to the small size of the staff, each employee fulfills multiple roles. In order to complete all specialized staff interviews, there were not enough staff to meet the minimum number of random staff interviews. However, each staff was asked all questions on the Random Staff interview protocol.

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):	15
76. Were you able to interview the Agency Head?	 Yes No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	 Yes No
78. Were you able to interview the PREA Coordinator?	 Yes No
79. Were you able to interview the PREA Compliance Manager?	 Yes No 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	Agency contract administrator
audit from the list below: (select all that apply)	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

	Other
81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	Ves No
82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	YesNo
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)	 Security/detention Education/programming Medical/dental Food service Maintenance/construction Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	The mental health contractor was not available during the onsite visit so interview was conducted via phone.

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 a	ll 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)?	YesNo
88. Informal conversations with staff during the site review (encouraged, not required)?	 Yes No

89. Provide any additional comments	No text provided.
regarding the site review (e.g., access to	
areas in the facility, observations, tests	
of critical functions, or informal	
conversations).	

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.).	No text provided.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited. 96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
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	0	0
Staff-on-inmate sexual harassment	0	0	2	0
Total	0	0	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:	0
a. Explain why you were unable to review any sexual abuse investigation files:	There were no allegations of sexual abuse in the facility.

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

105. Did your sample of STAFF-ON- INMATE SEXUAL ABUSE investigation files include administrative investigations?	 Yes No NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) 	
Sexual Harassment Investigation Files Select	ed for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	2	
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	 Yes No NA (NA if you were unable to review any sexual harassment investigation files) 	
Inmate-on-inmate sexual harassment investigation files		
108. Enter the total number of INMATE- ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0	
109. Did your sample of INMATE-ON- INMATE SEXUAL HARASSMENT files include criminal investigations?	 Yes No NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) 	
110. Did your sample of INMATE-ON- INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	 Yes No NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) 	

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?	 Yes No 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?	 Yes No 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.	No text provided.	
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.	 Yes 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

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment. Policy COR-19 Prison Rape Elimination Act (PREA) outlines the Ford County Jail's approach to preventing, detecting, and responding to such conduct. Under COR-19 PREA, the Jail Administrator is tasked with supervision and monitoring compliance with PREA standards. The Ford County Sheriff Office (FCSO) operates a singular facility, the Ford County Jail, and the Jail Administrator is designated as the PREA Coordinator. The Jail Administrator is an upper-level position, reporting the the Sheriff. The Jail Administrator confirmed during an interview that they have sufficient time and authority to develop, implement, and oversee the Ford County Jail efforts to comply with PREA standards in the facility.
	Compliance with this standard was determined upon review of:
	Policy COR-19 Prison Rape Elimination Act (PREA)
	Policy COR-1 Chain of Command

Interviews with Ford County Sheriff and Jail Administrator

Organizational Chart

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail has a contract with the United States Marshals Service and the Bureau of Prisons for the confinement of inmates. The Detention Services Intergovernmental Agreement (Number 26-99-0038) outlines services for the housing, safekeeping, and subsistence of Federal detainees. The service contract states that the facility must abide by all relevant PREA regulations. There have been no new contracts entered into or renewed for the confinement of inmates since the most recent PREA audit. The Ford County Jail Administrator acts as the contract administrator for the facility.
	Compliance with this standard was determined upon review of:
	Interview with Jail Administrator/Contract Facilitator
	Detention Services Intergovernmental Agreement (26-99-0038)
	Policy COR-19 Prison Rape Elimination Act (PREA)

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
staffing levels in the facility and providing documentati deviations from this plan. The Jail Administrator is requ plan, communicate with other managerial staff, and am indicated. Policy dictates that a review shall be done a	Policy COR-19 notes that the Jail Administrator is tasked with ensuring adequate staffing levels in the facility and providing documentation when there have been deviations from this plan. The Jail Administrator is required to review the staffing plan, communicate with other managerial staff, and amend the staffing plan when indicated. Policy dictates that a review shall be done annually with documentation of such a review place on file. The most recent review was conducted on December 10, 2022.
	The facility has a staffing plan that is predicated on an average daily census of 61 inmates, the maximum number of inmates that can be housed in the jail. Since the most recent PREA audit, the average daily number of inmates has been 40.
	There have been no deviations from the staffing plan. The facility staffing plan

requires a minimum of 2 certified correctional officers working the floor and 1 corrections/dispatch officer in the jail control room. The corrections/dispatch officer working the control room is responsible for adequately viewing the video monitoring system for inmate and staff movement within and outside the facility.
The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Policy COR-19 notes that the Sheriff or designee shall periodically conduct unannounced inspections and/or rounds through the jail that must occur on all shifts at least once per calendar year. Each inspection and/or round is documented and placed on file for PREA compliance purposes. Documentation for each year was submitted and reviewed.
Compliance with this standard was determined upon review of:
Staffing plan, "Supervision and Monitoring of Inmates and Staff"
Documented review of staffing plan, dated 12/10/2022
Downloaded documentation of unannounced rounds that cover all shifts
Interviews with Jail Administrator, Sheriff, and Intermediate-level and Higher-level Staff
Policy COR-19 Prison Rape Elimination Act (PREA)

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail does not have youthful inmates (inmates < 18 years old).
	Compliance with this standard was determined upon review of:
	Policy COR-19 Prison Rape Elimination Act (PREA)
	Interviews with Ford County Sheriff and Jail Administrator
	Detention Services Intergovernmental Agreement (Number 26-99-0038)

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

The Ford County Jail does not conduct cross-gender strip or cross-gender visual body cavity searches of inmates. Policy COR-1 states that body cavity searches will not be conducted by law enforcement personnel. If the officer feels the need for a body cavity search, he/she will contact their immediate supervisor. A "frisk" or pat down search is the primary means of preventing contraband from being introduced into the jail. Frisk searches will be conducted by same sex officers, per COR-1 policy.
The facility does not restrict female inmates' access to regularly scheduled available programming or other out-of-cell opportunities. All staff that were interviewed confirmed that cross-gender searches are neither permitted nor part of standard practice within the facility. This was also confirmed through interviews with female inmates. The staffing plan is such that a staff member of each gender is available to conduct a pat search when needed, absent exigent circumstances.
The Ford County Jail has implemented policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without staff of the opposite gender viewing, except in exigent circumstances or when such viewing is incidental to routine cell checks. Video surveillance is restricted to areas where inmates are fully clothed. Observations were made during the facility tour of this. Cells and day rooms are arranged in a manner where inmates can shower, change clothing, and use the toilet without being in view of staff of the opposite gender. Inmates confirmed during formal interviews and informal conversations that staff do not enter the housing unit when they are showering.
Policy COR-19 PREA requires that staff members be trained in cross-gender supervision. All training and education is documented and entered into the staff members' LEMS education file. The facility prohibits searching a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. There have been no transgender/intersex inmates in the past 12 months.
Compliance with this standard was determined upon review of:
Policy COR-1 Strip Searches and Frisk Searches
Policy COR-19 PREA
Interview with Random Sample of Staff, Inmates
Staff training records and training curriculum
Observations made during facility tour
Camera schematic

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard

Auditor Discussion
Policy COR-19 states that Ford County Jail staff will read required PREA information to each inmate who is unable to read and brief the inmate on all facets of PREA. Accommodations are to be made for inmates with disabilities and those who are not English proficient. PREA educational materials are available in both English and Spanish. If an inmate needs translation in a language other than those available, the facility uses translation services to transpose the information.
The facility does not permit the use of inmate interpreters, inmate readers, or other types of inmate assistants. There have been no instances where inmate interpreters have been used in the past 12 months. This was confirmed through information obtained during interviews with a random sample of staff. During the onsite visit, there was only one inmate with English as a second language. The inmate confirmed they received PREA information in Spanish. This inmate appeared to have English proficiency and did not require translation services.
Compliance with this standard was determined upon review of:
Policy COR-19 PREA
PREA education materials and information in Spanish
Interviews with PREA Coordinator, Agency Head, LEP inmates, and a Random Sample of Staff
Observations of PREA information in Spanish posted throughout the facility

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail prohibits hiring or promoting anyone who may have contact with inmates and enlisting the contract services of anyone who may have contact with inmates who has engaged in sexual abuse in confinement, been convicted of engaging or attempting to engage in sexual misconduct in the community or has been civilly or administratively adjudicated to have engaged in such activity. Policy ORG-1 explains that pre-employment requirements include no previous convictions involving felony or serious misdemeanor offenses or convictions related to moral turpitude.
	Before hiring new employees who will have contact with inmates, the Ford County Jail conducts a criminal background records check and makes best efforts to contact any prior institutional employers for information on substantiated allegations of sexual misconduct or resignation during a pending investigation of such allegations. Policy

COR-19 states that all employees, contractors, and volunteers will have a pre- employment background check and another one completed at least every five (5) years. The criminal history check is completed through the L.E.A.D.S. system and the sex offender registry. The facility considers material omissions regarding such misconduct, or the provision of materially false information, grounds for termination.
In the past 12 months, there were 3 people hired who would have contact with inmates. A review of personnel files confirmed a pre-employment background check was completed and documented for each. There have been no new contractors in the past 12 months.
Compliance with this standard was determined upon review of:
Interview with Administrative (Human Resources) Staff, PREA Coordinator
Files of 3 employees hired within the past 12 months
Personnel files for all employees to confirm background checks completed within the past 5 years
Policy ORG-1 Office Directive, Qualifications for Employment
Policy COR-19 PREA

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail has not acquired a new facility or made any substantial expansions or modifications since the last PREA audit. Electronic surveillance equipment, such as video cameras, are updated/replaced as needed. When upgrades to facilities and technologies are made, the Jail Administrator confirmed that there would be consideration made to how such technology would enhance the ability to protect inmates from sexual abuse.
	Compliance with this standard was determined upon review of:
	Interview with PREA Coordinator, Agency Head
	Observations made during facility tour of the central control room and camera placement
	COR-19 PREA

Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy COR-19 PREA requires that the sheriff or designee ensure all allegations of sexual abuse and/or harassment are promptly, thoroughly and objectively investigated by a person who has received specialized training according to PREA standards. If there are no qualified PREA investigators available at the time of an allegation, an outside investigative agency shall be contacted. Per policy, any outside investigative agency shall be trained and have the legal authority to conduct PREA investigations. Policy states that an outside investigative agency shall have a policy in place governing the conduct of PREA investigations. The Illinois State Police is the agency responsible for conducting administrative or criminal investigations when Ford County is unable.

When conducting a sexual abuse investigation, Ford County follows a uniform evidence protocol, adapted from the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents."

The facility offers any inmate who experiences sexual abuse access to a forensic medical examinations. These are done at an outside facility, Carle Hospital. Such forensic medical examinations are offered without financial cost to the victim. The Ford County Jail has a Memorandum of Understanding with Carle Hospital to offer such exams performed by SANEs/SAFEs. During the past 12 months, there have been no forensic medical exams, exams performed by a SAFE/SANE, or exams performed by a qualified medical professional.

Policy COR-19 PREA notes that inmates will be given communication and access with victim advocacy personnel and/or rape crisis organizations. Inmates may get such services at the Crisis Resource and Counseling Center (CRCC). Ford County has a written agreement with CRCC to provide victim advocate services.

Compliance with this standard was determined upon review of:

Uniform evidence protocol

Policy OPS-56 Sexual Assault Evidence Submission Act Notice of Emergency Rules

Memorandum of Understanding with Carle Foundation Hospital

Written agreement with CRCC

Policy COR-19 PREA

Interview with PREA Coordinator, Medical Contractor

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The policy is published on the facility website.
	In the past 12 months, there were 2 allegations that were received, and 2 resulted in an administrative investigation. There were no allegations referred for criminal investigation.
	The Ford County Jail had 1 investigator trained in conducting PREA allegations. The auditor was made aware on 6/19/23 that this investigator had passed away on 6/16/23. As such, all allegations of sexual abuse and sexual harassment are now referred to the Illinois State Police for investigation until a new staff member is trained in conducting PREA investigations.
	Compliance with this standard was determined upon review of:
	Confirmation of PREA policy published on the facility website
	Interview with Agency Head and PREA Coordinator
	Documentation of reports of sexual harassment
	Documentation of investigative reports with findings
	Policy COR-19 PREA

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires staff members to be trained on all components within this standard. This facility houses both male and female inmates, and training is therefore tailored to both genders. The Ford County uses Lockup USA video for training.
	Training is completed in-house through mobile training units. Training is completed yearly, and staff sign a "Completion of Training" form, confirming their attendance and understanding of the content. Documentation is entered into the staff member's LEMS education file.
	Staff interviewed confirmed receiving training with required elements of the standard.

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Compliance with this standard was determined upon review of:
Interviews with a random sample of staff
Employee training records
PREA training curriculum
Documentation of employee signatures signifying comprehension and completion of training
Policy COR-19 PREA

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 states that volunteers and contractors who have contact with inmates are required to be educated on their responsibilities under the facility policies and procedures concerning sexual abuse and sexual harassment prevention, detection, and response. The training is based on services provided and the level of contact that service person(s) has with the inmates.
	There are 2 contractors who have contact with inmates, and both confirmed they had received training on the zero-tolerance policy regarding sexual abuse and sexual harassment and informed on how to report such incidents. The facility has not had volunteers since the COVID pandemic.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA Interview with Mental Health, Medical contractors
	Training records and curriculum for contractors

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 states that inmates shall receive PREA information as soon as practical upon intake and no later than being dressed out and housed in a cell. Staff members are to document and direct inmates to read and understand the information provided. There were 375 inmates admitted within the past 12 months who were given this

information at intake.
Inmates receive a rule book which reviews their right to be free from sexual harassment and sexual abuse while at the Ford County Jail. They are informed of their right to report and procedures for how to report allegations of sexual misconduct. When setting up their account on the kiosks in each cell block, the inmates are required to review the PREA education information. Information is available in English and Spanish and in a format that is accessible to all inmates.
Inmates are shown a video with information, and the facility documents inmate participation in PREA education sessions. Information is also posted throughout the facility, a requirement mandated by the intergovernmental agreement with the Bureau of Prisons and United States Marshals Service. Inmates' cards are marked to indicate they have received the information.
Compliance with this standard was determined upon review of:
Policy COR-19 PREA
Detention Services Intergovernmental Agreement (26-99-0038)
Educational and informational materials
Inmate rule book
Observations during facility tour of PREA signage
Log of inmate participation in PREA education sessions
Interview with Intake Staff and Inmates

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail requires that investigators are trained in conducting sexual abuse investigations in confinement. Until 6/16/23, the facility had 1 investigator trained in conducting sexual abuse investigations. There are no current PREA investigators, so administrative and criminal investigations are conducted by the Illinois State Police.
	Compliance with this standard was determined upon review of:
	Certificate of Completion for specialized PREA investigation training for most recent staff investigator
	Interview and written communication with PREA Coordinator

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail enlists the services of 2 contractors, a mental health provider and a medical provider, through Advanced Correctional Health (ACH). Policy COR-19 PREA states that contractors who have contact with inmates are required to undergo training on all components included in this standard.
	The mental health provider works 4 hours a week, and the nurse works 6 hours a week at the facility. Medical staff do not conduct forensic medical exams at this facility.
	Compliance with this standard was determined upon review of:
	Documentation of training for medical and mental health contractors
	Policy COR-19 PREA
	Interview with Mental Health, Medical
	Training curriculum

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Correctional Officers complete a screening of each inmate upon booking that evaluates the risk for sexual abuse victimization or sexual abusiveness toward other inmates. This screening takes place within 72 hours of their arrival at the facility. The risk assessment includes an objective screening instrument that considers all criteria required by this standard.
	Policy COR-1 reviews the classification of inmates. Information obtained during the screening is considered when classifying and determining housing units for the inmate. Inmates' risk of victimization or abusiveness is reassessed within 30 days based upon any additional, relevant information that is received by the facility. Inmates are not disciplined for refusing to answer or for not disclosing complete information during the screening.
	There were no admissions to the Ford County Jail during the time of the onsite portion of the PREA audit. Therefore, the auditor observed a mock risk screening conducted by staff responsible for risk screening.
	Screenings are entered into the computer and printed out for review by the mental

health and medical staff. These are kept in a cabinet in the booking room. Information contained within the screening is only shared with staff on a need to know basis.
Compliance with this standard was determined upon review of:
Records for inmates admitted to the facility within the past 12 months
Risk screening instrument
Observation of mock screening
Interview with Staff Responsible for Risk Screening and PREA Coordinator
Interview with Inmates

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility uses the information obtained during the initial risk screening to inform housing, bed and program assignments. Interviews with staff confirm that any inmate identified as being high risk of sexual victimization would be housed separate from those at high risk of being sexually abusive. In an interview with the PREA Coordinator, it was noted that due to the facility's small size, the staff are more familiar with the inmates (e.g. behavior, more frequent interactions, etc). They use this and screening information to make informed housing assignments.
	There have been no transgender or intersex inmates at the Ford County Jail in the past 12 months. However, the facility would consider on a case-by-case basis whether a placement would ensure the inmate's health and safety or would present management or security problems. A transgender or intersex inmate would be given the opportunity to shower in the booking room, separate from others in their living unit. Lesbian, gay, bisexual, transgender, or intersex inmates are not housed in separate facilities, units or wings solely based on such identification or status.
	Compliance with this standard was determined upon review of:
	Interview with Staff Responsible for Risk Screening, PREA Coordinator, and a Random Sample of Staff
	Risk based housing decisions
	Facility tour with observations of shower areas that transgender or intersex inmates could use

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail does not place inmates at high risk for sexual victimization in involuntary segregated housing. The facility does have isolation rooms used for disciplinary purposes or safety controls. However, an inmate would not be placed in this cell simply for being at risk of sexual abuse and/or sexual harassment. There have been no inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months. Policy COR-19 PREA requires the sheriff or designee to take immediate action to protect an inmate upon learning that the inmate is subject to substantial risk of imminent sexual abuse.
	Compliance with this standard was determined upon review of:
	Interviews with Staff Who Supervise Inmates in Segregated Housing, Warden or Designee
	Policy COR-19 PREA
	Inmate Rule Book
	Observations made during facility tour

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA notes that inmates can privately report to agency officials about sexual abuse or harassment, retaliation for reporting such misconduct, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates may make reports verbally to any staff member, written on an Inmate Request/Complaint Form, or electronically through the kiosks located in each housing unit.
	Policy COR-19 PREA requires that staff immediately report any knowledge, suspicion, and/or information regarding sexual abuse and/or sexual harassment. All reporting procedures are reviewed during annual PREA training. During interviews with staff, it was apparent that they understood their responsibility to accept both verbal and written reports, as well as how to make a report themselves.
	Inmates may also report externally to third parties, including family, friends, fellow inmates, the Crisis Resource and Counseling Center (CRCC) and the Rape Advocacy Counseling & Education Services (RACES). The contact information for these places

	are posted throughout the facility and given to the inmates in the Inmate Rule Book.
	During the onsite audit, signage was observed throughout the facility with information on how to report sexual abuse and sexual harassment. The information was posted in English and Spanish, the most common languages spoken by inmates at the Ford County Jail. Information was in a format that was easily accessible. Kiosks were noted to be in all housing areas and available for all inmates to use.
	The Ford County Jail does not detain inmates solely for civil immigration purposes.
	Compliance with this standard was determined upon review of:
	Observations of signage throughout the facility
	Interview with PREA Coordinator, Random Sample of Staff
	Informal conversations and formal interviews with inmates
	Policy COR-19 PREA
	Informational materials given to inmates during intake
	Testing of Staff Reporting

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Inmates are permitted to file a grievance regarding sexual abuse. Such incidents may be documented using the Inmate Request/Complaint Form. These forms are reviewed by the Jail Administrator or designee. These forms may be submitted to any staff member, therefore allowing the inmate to make a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. There have been no grievances that alleged sexual abuse in the past 12 months.
	Policy COR-19 PREA establishes procedures filing an emergency grievance alleging that an inmate is subject to substantial risk of imminent sexual abuse. Policy requires immediate response. There have been no emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Inmate Rule Book
	Inmate Request/Complaint Form

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail offers inmates access to outside victim advocacy and emotional support services related to sexual abuse. The facility has a formal partnership with the CRCC to provide such services. Contact information is provided to inmates in the Inmate Rule Book and posted throughout the facility in the living units.
	During the onsite audit, the PREA Coordinator worked to get the phone number to CRCC classified as 'privileged' so that these calls could be made anonymously and free of charge. Privileged phone calls are also not monitored, as compared to other phone calls made using the Homewav system.
	Compliance with this standard was determined upon review of:
	Letter of agreement with CRCC
	Inmate Rule Book
	Policy COR-19 PREA
	Interview with PREA Coordinator, Inmates
	Inmate educational materials

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail accepts all third-party reports of inmate sexual abuse or sexual harassment. These may be made verbally or in writing. The PREA policy is posted on the facility website for with information about how to report inmate sexual abuse or harassment on behalf of an inmate. Such information is also posted on signage in the lobby of the facility, a public area that can be accessed by family, friends, advocates, and attorneys. Any staff member may accept a third-party report and must then immediately notify their direct supervisor.
	Compliance with this standard was determined upon review of:
	Observation of signage throughout facility and in public areas
	Confirmation of information posted on the facility website
	Interview with a Random Sample of Staff, PREA Coordinator

Testing of third-party reporting

Policy COR-19 PREA

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires that any staff member that suspects or learns of an allegation of sexual abuse is to immediately contact their immediate supervisor, regardless of whether the alleged abuse or harassment occurred in the Ford County Jail or another facility. Supervisors are to contact the Jail Administrator and the Sheriff. Staff must immediately report retaliation against inmates or staff who report such an incident or neglect or violation of responsibilities that may have contributed to an incident or retaliation. All staff interviewed understood their responsibilities under this policy.
	Medical and mental health contractors are required to report sexual abuse in accordance with the criteria outlined in the standard. Medical and mental health practitioners are also required to inform inmates of their duty to report and the limitation of confidentiality at the initiation of services. Interviews with medical and mental health contractors confirmed their understanding of this requirement.
	Compliance with this standard was determined upon review of:
	Training curriculum of ACH contractors
	PREA training curriculum and signed training forms
	Interviews with Medical and Mental Health contractors
	Interviews with PREA Coordinator and Random Sample of Staff
	Policy COR-19 PREA

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires that the facility must take immediate action to protect an inmate upon learning that the inmate is subject to a substantial risk of imminent sexual abuse. Staff are to immediately remove the inmate from the environment of

potential harm and contact their immediate supervisor. There have been no situations in the past 12 months where the facility determined that an inmate was subject risk of such risk.
Compliance with this standard was determined upon review of:
Interviews with Random Sample of Staff, PREA Coordinator
Policy COR-19 PREA

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires that any staff that suspects or learns of an allegation of sexual abuse that may have happened at another facility is required to contact their immediate supervisor. The supervisor is to contact the Jail Administrator and Sheriff as soon as practical. The Sheriff or designee shall then contact the administrator of the facility where the allegation was reported. This notification is done as soon as practical, but no longer than 72 hours after learning of the allegation. There have been no allegations in the past 12 months that an inmate was abused while confined at another facility.
	Policy COR-19 PREA also requires that allegations received from other facilities are to be investigated om accordance with PREA standards. There was one allegation received from another facilities within the past 12 months. This allegation had been investigated and determined to be unfounded.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Interviews with PREA Coordinator, Warden or Designee
	Documentation of investigative report

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA details the first responder duties for staff upon learning of an allegation of sexual abuse. The policy requires that staff separate the alleged victim

and abuser, preserve and protect the crime scene in order, and request the alleged victim not take any actions that could destroy physical evidence. Due to the small size of the Ford County Jail, all staff are considered both first responders and security staff. The first responder duties are reviewed during staff PREA training, and interviews with staff confirmed understanding of their duties under this policy.
Compliance with this standard was determined upon review of:
Policy COR-19 PREA
Interview with Security Staff and Non-Security Staff First Responders, Random Sample of Staff
Policy OPS-56 Sexual Assault Evidence Submission Act Notice of Emergency Rules
PREA training curriculum
Sample of staff training records

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse. This plan is a coordinated response among staff first responders, medical and mental health practitioners, investigators, and facility leadership. This plan is detailed in the Ford County Jail Policy COR-19 PREA.
	Compliance with this standard was determined upon review of:
	Interview with Warden or Designee
	Policy COR-19 PREA
	Institutional plan

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Sheriff's Office has not entered or renewed a collective bargaining agreement since the last PREA audit in 2020. The most recent labor agreement went

into effect in 2019 with the Illinois Fraternal Order of Police. This agreement does not limit the facility's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or determination of whether and to what extent discipline is warranted.
Compliance with this standard was determined upon review of:
Labor Agreement between Ford County Sheriff and The IL Fraternal Order of Police
Interview with Agency Head

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA notes that Ford County Jail staff members, inmates, and third parties reporting sexual abuse and/or harassment are protected under PREA. Retaliation and/or harassment by staff members toward reporting individuals are subject to disciplinary action up to and including termination of employment.
	While all Ford County Jail staff members are charged with monitoring for possible retaliation, the Jail Administrator is the individual formally designated with this responsibility.
	The facility employs various protection measures, such as housing changes or transfers for inmate victims and abusers, having no contact orders in place, and ongoing security checks to ensure safety. The facility monitors the conduct or treatment of inmates or staff who reported sexual abuse for the duration of the inmate's time at the facility. Information is documented in an incident report and kept on the inmate's file. Over the past 12 months, there have been no incidents of relation monitoring.
	Compliance with this standard was determined upon review of:
	Interview with Staff Member Charged with Monitoring Retaliation, Warden or Designee
	Policy COR-19 PREA

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

The Ford County Jail prohibits placing inmates who alleged to have suffered sexual abuse in involuntary segregated housing unless there are no available alternatives. Policy COR-19 PREA requires that a victim of alleged sexual abuse be placed into protective segregated custody and monitored every 15 minutes until a mental health evaluation can be performed. Should the facility not be at full capacity, the victim would be moved to another housing unit pending a mental health evaluation. The mental health and medical contractors are in the facility weekly so the inmate would be evaluated during such time.
Over the past 12 months, there have been no inmates who alleged to have suffered sexual abuse who were held in involuntary segregated housing.
Compliance with this standard was determined upon review of:
Observations during facility tour of segregated housing and video surveillance monitoring in central control room
Interview Staff who Supervise Inmates in Segregated Housing, PREA Coordinator

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA outlines the Ford County Jail criminal and administrative investigation procedures. The investigative staff responsible for conducting such investigations passed awed shortly before the PREA audit and was unable to interviewed. The facility is in the process of identifying a new staff member to assume these duties, and this individual will undergo specialized training of PREA investigations. Until such time, all criminal investigations are conducted by the Illinois State Police.
	Policy requires that outside agency investigators shall have specified PREA training and the legal authority to conduct such criminal investigations. Further, the external investigative agencies are required to have their own policy governing the conduct of PREA investigations.
	When the facility conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly and objectively. This includes allegations made by third parties and anonymous reports. Evidence is collected in adherence with the Sexual Assault Evidence Submission Act. Alleged victims, suspected perpetrators, and all witnesses are interviewed, and a report is completed with documented findings. Any substantiated allegations of conduct that appear to be criminal are referred for prosecution. There have been no such substantiated

	allegations since the last PREA audit. Reports are retained for as long as the alleged abuser is incarcerated or employed plus five years.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Interview with PREA Coordinator, Warden or Designee
	Specialized PREA Investigation training certificate for recently deceased investigative staff
	Policy OPS-56 Sexual Assault Evidence Submission Act Notice of Emergency Rules
	Sample of investigative reports

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA notes that the evidentiary standard for administrative investigations involving allegations of sexual abuse and/or sexual harassment will be established no higher than a preponderance of the evidence in determining whether the allegations of sexual abuse and/or sexual harassment are substantiated. As noted, there are no current investigative staff in the facility so allegations are investigated by an outside agency.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Policy OPS-56 Sexual Assault Evidence Submission Act Notice of Emergency Rules
	Documentation of administrative findings from investigative report
	Interview with PREA Coordinator

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA requires that alleged victims are notified of the outcome of an investigation as to whether the allegation has been determined to be substantiated,

unsubstantiated or unfounded. In the past 12 months, there have been no criminal and 2 administrative investigations completed. Both administrative investigations were determined to be unsubstantiated. Inmates making the allegations were no longer in the facility for interview. There were no investigations of sexual abuse or sexual harassment conducted by outside agencies.
Compliance with this standard was determined upon review of:
Documentation of administrative findings
Interview with PREA Coordinator
Policy COR-19 PREA

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA details the discipline for a volunteer, contractor, or visitor who engages in sexual abuse. Any volunteer or contractor accused of sexual abuse and/or sexual harassment will not have entry into the facility and is barred from contact with inmates until the completion of an administrative and/or criminal investigation has been completed.
	Substantiated allegations are forwarded for prosecution. Unsubstantiated allegations are forwarded to the sheriff for review to determine if the accused person may be allowed entry or barred indefinitely from the facility.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Contractor training curriculum and attendance confirmation

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA details the discipline for a volunteer, contractor, or visitor who engages in sexual abuse. Any volunteer or contractor accused of sexual abuse and/or sexual harassment will not have entry into the facility and is barred from contact with inmates until the completion of an administrative and/or criminal investigation has

been completed.
Substantiated allegations are forwarded for prosecution. Unsubstantiated allegations are forwarded to the sheriff for review to determine if the accused person may be allowed entry or barred indefinitely from the facility. There have been no contractors or volunteers who have been found have engaged in sexual abuse or sexual harassment of an inmate in the past 12 months.
Compliance with this standard was determined upon review of:
Policy COR-19 PREA
Contractor training curriculum and attendance confirmation
Interview with Warden or Designee

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA is the policy that outlines disciplinary sanctions for inmates found guilty of engaging in inmate-on-inmate sexual abuse. Pursuant to a formal disciplinary process, inmates who are found guilty of engaging in inmate-on-inmate sexual abuse are sanctioned up to and including criminal prosecution. The Ford County Jail makes individualized assessments in the disciplinary process, including consideration of whether an inmate's mental disabilities or mental illness contributed to the behavior when determining sanctions.
	Policy COR-19 PREA states that the Ford County Jail will not discipline an inmate for sexual contact with a staff member unless it is found that the staff member did not consent to the contact. Further, inmates are not disciplined for reporting sexual abuse made in good faith, based upon a reasonable belief that the alleged conduct occurred to constitute false reporting or lying. Inmates are informed of this during admission, and the information is contained within the rule book.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA
	Inmate Rule Book
	Inmate education handouts
	Interview with Warden or Designee, PREA Coordinator, Medical and Mental Health Staff

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Inmates who disclose prior sexual victimization are offered a follow up meeting with a medical and/or mental health provider. The mental health and medical provider are onsite at the Ford County Jail at least once weekly, so the inmate is seen for a follow up within 14 days. Medical and mental health providers use maintain documentation of visits using secondary screening and interview materials.
	All information related to sexual victimization or abusiveness is limited to medical, mental health and security personnel. Such documentation is kept in a locked area where only the individuals above have access.
	Interviews with medical and mental health practitioners confirmed that they obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.
	Compliance with this standard was determined upon review of:
	Interview with Medical and Mental Health Staff, Staff Responsible for Risk Screening
	Mental health screening interview, mental health services clinical contact, medical history and health appraisal, medical progress note.
	Observations made during facility tour of storage areas with screening information
	Training curriculum for contract medical and mental health personnel
	Sample of inmate screening records

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Ford County Jail provides victims of sexual abuse timely, unimpeded access to emergency medical care and crisis intervention services. Policy COR-19 PREA notes a first responder is responsible for contacting emergency medical services, and medical and mental health advice and protocols are followed for further treatment and/or evaluation. Contract medical and mental health personnel maintain documentation of all care that is provided.
	When medical and mental health personnel are not available, security staff first responders are responsible for taking preliminary steps to separate the alleged victim from the abuser and contact emergency services. Inmate victims of sexual abuse are

offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis.
Treatment services are provided to every victim without financial cost, as required by the Detention Services Intergovernmental Agreement (Number 26-99-0038). Emergency services are delivered at Carle hospital located closest to the facility.
Compliance with this standard was determined upon review of:
Detention Services Intergovernmental Agreement (Number 26-99-0038)
Policy COR-19 PREA
Interview with Medical, Mental Health Staff
Interview with Security Staff and Non-Security Staff First Responders
Mental health screening interview, mental health services clinical contact, medical history and health appraisal, medical progress note
Sample of inmate records

Ongoing medical and mental health care for sexual abuse victims and abusers
Auditor Overall Determination: Meets Standard
Auditor Discussion
Policy COR-19 PREA notes that inmates who have been victimized by sexual abuse in a correctional setting are given communication and access to emotional support services and have the ability to contact service providers. The facility also has a contract medical and mental health practitioners who are available for evaluation and treatment, as appropriate. When necessary, follow up services, treatment plans, and continued care are coordinated following an inmate's transfer or release from custody.
The Ford County Jail has written agreements with local community health agencies for the provision of such services. Interviews with medical personnel confirm that female victims of sexual abusive vaginal penetration are offered pregnancy tests and receive timely and comprehensive information about all lawful pregnancy-related medical services. Such treatment is provided without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any related investigation.
Compliance with this standard was determined upon review of:
Detention Services Intergovernmental Agreement (Number 26-99-0038)

Policy COR-19 PREA

Interview with Medical, Mental Health Staff

Written agreement for services with CRCC

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policy COR-19 PREA notes that any reported incidences of PREA violations will be administratively reviewed for potential policy and procedure changes and forwarded to staff members. The sexual abuse incident review team includes the Jail Administrator/PREA Coordinator, Investigative Staff, and any other staff involved in the incident. Such reviews take place within 30 days of the investigation's conclusion.
	In the past 12 months, there were no criminal or administrative investigations of alleged sexual abuse. The incident review team considers what factors contributed to the incident, how such an incident can be prevented in the future, and any policy or staffing changes needed. In an interview with the PREA Coordinator, it was confirmed that all tenets within this standard would be reviewed and any actionable findings would be implemented accordingly.
	Compliance with this standard was determined upon review of:
	Policy COR-19 PREA Interview with PREA Coordinator, Warden or Designee

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. Data is collected in accordance with Policy OPS-56 Sexual Assault Evidence Submission Act. Incident-based sexual abuse data is aggregated at least annually and includes, 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. The DOJ has not requested agency data for the previous calendar year as of the date of the onsite portion of the PREA audit. Compliance with this standard was determined upon review of:

Policy OPS-56 Sexual Assault Evidence Submission Act

Sample of aggregated data

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility routinely assesses the effectiveness of its PREA policy and efforts to prevent, detect, and respond to sexual abuse. Corrective action is taken when it has been determined that incident data supports policy or procedure change. Aggregated annual data is made available upon request with all identifying information redacted.
	Compliance with this standard was determined upon review of:
	Interview with PREA Coordinator, Warden or Designee
	Annual report

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Incident-based data is securely retained in accordance with requirements of this standard. Aggregated sexual abuse data is made available annually upon request with all personal identifiers removed. The facility maintains data for at least 10 years after the date of initial collection.
	Compliance with this standard was determined upon review of:
	Policy OPS-56 Sexual Assault Evidence Submission Act
	Sample of aggregated data
	Interview with PREA Coordinator

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

The last PREA audit was conducted in April 2020. The Ford County Jail is a single facility which contracts with the Bureau of Prisons for the confinement of inmates. The auditor was granted access to and observed all areas of the audited facility. All requests for copies of relevant documentation (including electronically stored information) was permitted. The auditor had a private space in the facility to conduct interviews with inmates during the onsite audit. Inmates were provided notification of the audit and contact information via a P.O. Box to send confidential information or correspondence to the auditor. The auditor observed audit notices posted throughout the facility during the facility tour. The PREA Coordinator sent pictures of posted audit notices ahead of the audit. Informal conversations with inmates confirmed that notices were posted with a appropriate time prior to the onsite audit.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The PREA Final Report from 2020 was made available electronically on the Ford County Sheriff website.

Appendix:	Provision Findings	
115.11 (a)	Zero tolerance of sexual abuse and sexual harassmer coordinator	nt; PREA
	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 harassmer coordinator	nt; PREA
	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 harassmer coordinator	nt; PREA
	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 o	f 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 o	f 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.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	facility does not have female inmates.)	
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)?	yes
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 proficient	d English
	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 proficient	l English
	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 proficient	l English
115.16 (c)		yes
115.16 (c) 115.17 (a)	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?	_
	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?	_
	proficientDoes 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?Hiring and promotion decisionsDoes 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	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
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
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
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
	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)? 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? 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? 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? 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? Hiring and promotion decisions Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check? 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? Hiring and promotion decisions Does the agency perform a criminal background records check before enlisting the services of any contractor who may have

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	5
	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	5
	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 investig	ations

	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 investig	ations
	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 investig	ations
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
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	yes
	inmates on the common reactions of sexual abuse and sexual harassment victims?	
i	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
i	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) I	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,	yes
	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
	does the agency provide refresher information on current sexual	
115.31 (d) I	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes

	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	
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
115.33 (f) 115.34 (a)	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
	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 yes
	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? 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).)	
115.34 (a)	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? 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).)	
115.34 (a)	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? 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).) 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	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
	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	yes yes
	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.) 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	

	suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
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.)	na
	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 degree, 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 degree, 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.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
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	yes yes
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting	
115.51 (b)	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? 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? 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
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? 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? 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
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?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?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?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	yes yes
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?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?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?Inmate reportingDoes 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?Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to	yes yes yes

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	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	-

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	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 service	:S
	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 service	S
	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 service	S
	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	1
	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	yes
	abuse involving the suspected perpetrator?	,
115.71 (d)		,
115.71 (d)	abuse involving the suspected perpetrator?	yes
115.71 (d) 115.71 (e)	abuse involving the suspected perpetrator? 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?	-
	abuse involving the suspected perpetrator? 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?	-
	abuse involving the suspected perpetrator? 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? 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	yes
	abuse involving the suspected perpetrator? 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? 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? 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	yes
115.71 (e)	abuse involving the suspected perpetrator? 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? 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? 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 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 (I)	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).)	yes
115.72 (a)	Evidentiary standard for administrative investigation	S
	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 sex	ual 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).	na
115.81 (b)	Medical and mental health screenings; history of sex	ual 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.)	na
115.81 (c)	Medical and mental health screenings; history of sex	ual 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 sex	ual 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 sex	ual 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 serv	ices
	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 serv	ices
	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 serv	ices
	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 serv	ices
	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 al victims and abusers	buse
	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 al victims and abusers	buse
	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 al	buse

	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 al victims and abusers	buse
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual al victims and abusers	buse
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual al victims and abusers	buse
	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 al victims and abusers	buse
	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 al victims and abusers	buse
	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.)	na
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	
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 (a) 115.89 (b)	Does the agency ensure that data collected pursuant to § 115.87	yes
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes yes
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained? 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	
115.89 (b)	Does the agency ensure that data collected pursuant to § 115.87 are securely retained? 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?	
115.89 (b)	Does the agency ensure that data collected pursuant to § 115.87 are securely retained? 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? Data storage, publication, and destruction Does the agency remove all personal identifiers before making	yes
115.89 (b) 115.89 (c)	Does the agency ensure that data collected pursuant to § 115.87 are securely retained? 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? Data storage, publication, and destruction Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

115.403	Audit contents and findings	
	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
115.401 (n)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (m)	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 (i)	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 (h)	Frequency and scope of audits	·
	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
	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.)	na
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	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

(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