

PREA Facility Audit Report: Final

Name of Facility: Corrections Center of Northwest Ohio

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/11/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Valerie Wolfe Mahfood	Date of Signature: 08/11/2024

AUDITOR INFORMATION	
Auditor name:	Mahfood, Valerie Wolfe
Email:	wolfemahfood@aol.com
Start Date of On-Site Audit:	06/24/2024
End Date of On-Site Audit:	06/26/2024

FACILITY INFORMATION	
Facility name:	Corrections Center of Northwest Ohio
Facility physical address:	3151 County Road 2425, Stryker, Ohio - 43557
Facility mailing address:	

Primary Contact

Name:	Jamie Jones
Email Address:	jamie.jones@ccnojail.org
Telephone Number:	419-428-3800 ext. 40

Warden/Jail Administrator/Sheriff/Director	
Name:	Dennis Sullivan
Email Address:	dennis.sullivan@ccnojail.org
Telephone Number:	419-428-3800 ext. 20

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

Facility Health Service Administrator On-site	
Name:	Brook Little
Email Address:	blittle@vitalcorehs.com
Telephone Number:	419-428-3800 ext. 52

Facility Characteristics	
Designed facility capacity:	688
Current population of facility:	528
Average daily population for the past 12 months:	546
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:	18-75
Facility security levels/inmate custody levels:	Minimum, Medium, Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	147
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	262
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	119

AGENCY INFORMATION

Name of agency:	Corrections Center of Northwest Ohio Board of Directors
Governing authority or parent agency (if applicable):	
Physical Address:	3151 County Road 2425, Stryker, Ohio - 43557
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:

Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information

Name:	Jamie Jones	Email Address:	jamie.jones@ccnojail.org
--------------	-------------	-----------------------	--------------------------

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:

5

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.17 - Hiring and promotion decisions
- 115.32 - Volunteer and contractor training
- 115.33 - Inmate education
- 115.401 - Frequency and scope of audits

Number of standards met:

40

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:	2024-06-24
2. End date of the onsite portion of the audit:	2024-06-26

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Williams County Victim Assistance The Center for Child and Family Advocacy Just Detention International

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	688
15. Average daily population for the past 12 months:	546
16. Number of inmate/resident/detainee housing units:	20
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	544
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:	00
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:	00
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:	1
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:	3
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:	3
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:	11

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>3</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>26</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>Inmates were allowed to self-select out of and/or into all targeted categories during the interview process. As such, while facility records may or may not include inmates currently within targeted categories, targeted protocols were still completed for any inmate who self-selected into any targeted protocol at the time of the interview. Also, it should be noted that if there were not sufficient numbers of inmates assigned to the facility within a targeted group, oversampling was done in other targeted groups to ensure the minimum number of targeted interviews were conducted.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>167</p>

50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	101
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:	17
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:	NA

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

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

<p>If "Other," describe:</p>	<p>Custody, Job Assignment, Program Activity, Physical Characteristics, Psychological Characteristics, Primary Language Spoken, or other distinguishing factors amongst population.</p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Housing rosters</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No barriers to completing random interviews were noted.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>16</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>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:</p>	<p>2</p>

<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>6</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>

<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>3</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>4</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Reviewed facility documentation. Asked random staff if any inmates were ever placed in segregated housing for the risk of sexual victimization or for having alleged to have been a victim of sexual abuse. Asked all inmates who reported sexual victimization if they had ever placed in segregated housing for the risk of sexual victimization or for having alleged to have been a victim of sexual abuse. Reviewed current assignment rosters, interviewed inmates having filed previously disclosed sexual abuse or filed sexual abuse/harassment allegations to determine if said inmates had been placed in segregation for filing said allegations.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>Inmates were allowed to self-select out of and/or into all targeted categories during the interview process. As such, while facility records may or may not include inmates within targeted categories, targeted protocols were still completed for any inmate who self-selected into any targeted protocol at the time of the interview. Also, it should be noted that if there were not sufficient numbers of inmates assigned to the facility within a targeted group, oversampling was done in other targeted groups to ensure the minimum number of targeted interviews were conducted.</p> <p>One inmate declined the opportunity to interview.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>

<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>Gender, race, ethnicity, languages spoken, or other distinguishing factors amongst staff relative to their employment.</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>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):</p>	<p>No barriers to completing random staff interviews were noted.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>15</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Commissary, Laundry, Mailroom Staff, Training Staff, Chaplain, Law Library, Internet Technology staff facilitating inmate tablet access, and SAFE/SANE staff associated with the local hospital
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	3

<p>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input checked="" type="checkbox"/> Medical/dental</p> <p><input checked="" type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
--	---

<p>83. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>NA</p>
--	-----------

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.

<p>84. Did you have access to all areas of the facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
---	---

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

<p>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)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
--	---

<p>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)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>NA</p>
<p>Documentation Sampling</p>	
<p>Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.</p>	
<p>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?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>Additional document sampling was done both at random, as well as in coordination with comments received from inmates and staff during the interview process.</p>

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	2	0	1	1
Staff-on-inmate sexual abuse	4	0	4	0
Total	6	0	5	1

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	4	0	4	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	6	0	6	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	1	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	1	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	2	0
Staff-on-inmate sexual abuse	0	3	1	0
Total	0	3	3	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	2	1
Staff-on-inmate sexual harassment	0	1	2	0
Total	0	1	4	1

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:	5
--	---

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>3</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>7</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	NA
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:	1

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> • CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 • CCNO #1003, Code of Ethics and Conduct of Employees, 1-24-23 • CCNO #1009, Organizational Chart • CCNO Memo, 3-5-24 • CCNO Welcome Book, 2024 • CCNO Inmate Roster, 6-24-24 • CCNO Staff Roster, 6-24-24

- CCNO Zero Tolerance Poster, English
- CCNO Zero Tolerance Poster, Spanish

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Random Staff

Site Review Observations:

- The Corrections Center of Northwest Ohio (CCNO) PREA Coordinator oversees the CCNO Regional Jail PREA program.
- The CCNO PREA Compliance Manager is physically assigned to the CCNO and maintains a permanent office, with routine activities, within said institution as a function of assignment.

Standard Subsections:

(A) The CCNO has a written policy; namely, CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21, mandating “a zero tolerance toward all forms of sexual abuse and sexual harassment.” This policy also outlines the agency’s approach to preventing, detecting, and responding to sexual harassment and sexually abusive conduct. “This policy applies to all inmates, and to all persons employed by the Corrections Commission of Northwest Ohio, volunteers and contractors working at CCNO and/or providing services to inmates” (#5002).

(B) The agency employs an upper-level administrator, the Commander of Operations, who serves as the facility PREA Coordinator. This individual confirms having sufficient

time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at its facility.

(C) The CCNO is a stand-alone facility. As such, the agency is exempt from this provision. Nonetheless, in excess of the PREA Standards, the CCNO has designated a PREA Compliance Manager who serves in the role of Accreditation & Inspections Supervisor. This person's job duties are dedicated to maintaining institutional compliance with agency standards, which includes facility compliance of PREA regulations.

Reasoning & Findings Statement:

This standard promotes agency expectations of zero-tolerance for sexual abuse and sexual harassment of inmates. As noted by agency policy, CCNO is bound to provide a safe, humane, and appropriately secure environment, which is free from the threat of sexual harassment and sexual assault for all inmates, by maintaining a program of prevention, detection, response, investigation, and tracking. The agency has created an upper-level agency PREA Coordinator position with both the time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at its only correctional facility. Additionally, in excess of the minimum standards for a singular facility, the agency has a designated a PREA Compliance Manager whose primary responsibility is facility compliance with both agency and accreditation standards. As such, the agency has exceeded the minimum requirements of this standard.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Documents: · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO Memo, 3-5-24 Interviews:

- Agency Head
- Agency Contract Administrator
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator

Site Review Observations:

- The CCNO is a publicly operated correctional facility through the Corrections Commission of Northwest Ohio.

Standard Subsections:

(A) The CCNO is a public agency. However, it does not contract for the confinement of its inmates with private agencies or other entities, including other government agencies.

(B) The CCNO does not contract for the confinement of its inmates with private agencies or other entities, including other government agencies.

Reasoning & Findings Statement:

The CCNO is a publicly operated correctional facility through the Corrections Commission of Northwest Ohio. The agency does not contract for the confinement of its inmates with private agencies or other entities, including other government agencies. As such, the CCNO has met the minimum requirements of this standard.

115.13 Supervision and monitoring

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #3003, Hours of Work Day / Overtime / Flex Time, 8-4-20
- CCNO #5105, Inspections, 5-18-23
- CCNO #2018, Supervision, Cross Gender Supervision and Movement of Inmates, 1-18-24
- CCNO Staffing Plan, 2023
- CCNO Memo, No Staffing Deviations, 3-5-24
- CCNO Memo, Review of 2023 Staffing Plan, 3-5-24
- CCNO Memo, Review of 2022 Staffing Plan, 2-8-23
- CCNO Memo, Review of 2021 Staffing Plan, 3-2-22
- CCNO Activity Log: 1-10-24, 2-22-24
- CCNO Daily Patrol Checklist: 1-9-24, 1-10-24, 1-11-24
- CCNO Daily, Weekly, Monthly Inspection Review Sheet, 2-29-24

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
 - Facility Administrator
 - Intermediate or Higher-Level Facility Staff
- Random Staff

Site Review Observations:

- All inmate housing areas contain at least one security staff post that is

continuously monitored by staff. All areas of high inmate traffic are assigned permanent staffing positions while in operation.

- During the site review, supervisory staff were observed making routine and frequent rounds throughout the facility. All random staff interviewed did indicate that supervisory staff were available to them and routinely conducted unannounced rounds within the facility.
- During supervisory rounds, ranking officials were observed reviewing required documentation completed by line staff as a function of their duty posts.
- During the onsite portion of the audit, current chronological housing logs were inspected throughout the facility to ensure staff were conducting, and properly documenting, unannounced rounds and, where appropriate, opposite gender announcements.

Standard Subsections:

(A) CCNO Policy #3003 requires the agency to “develop, document, and make its best effort to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and video monitoring, to protect inmates against sexual abuse.” As confirmed by the Facility Administrator, as well as noted within Policy #3003, “in calculating adequate staffing levels and determining the need for additional video monitoring, the CCNO shall take into consideration:

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacy;
- Any findings of inadequacy from Federal investigative agencies;
- Any findings of inadequacy from internal or external oversight bodies;
- All components of the CCNO’s physical plant (including ‘blind spots’ or areas where staff or inmates may be isolated);
- The composition of the inmate population;
- The number and placement of supervisory staff;
- Institution programs occurring on a particular shift;
- Any applicable State or local laws, regulations, or standards;
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- Any other relevant factors

The staffing plan will determine posts and relief factors. Essential posts will not be closed.”

(B) As noted by the PREA Compliance Manager, if the staffing plan were not complied with, the facility would justify and document any deviation from the required structure. However, within the audit time frame, documentation reflects that the staffing plan has remained in continuous compliance. Additionally, interviews with random staff and inmates reflect that there are sufficient staff present to conduct all required job functions.

(C) Per the Facility Administrator, the staffing plan is reviewed on an annual basis. Documentation of previous reviews supports this review is, in fact, conducted within approximately the same yearly timeframe. Per the PREA Coordinator, as a function of the annual review, the facility does consider the deployment of video monitoring systems and other monitoring technologies, as well as the resources the facility has available to commit to ensure adherence to the staffing plan.

(D) Policy #5105 requires that “supervisory staff will conduct daily, weekly and monthly inspections, unannounced and at irregular times, by all staff to assure a safe, clean and secure environment... Supervisory staff on each shift will conduct these unannounced rounds in an effort to identify and deter sexual abuse and sexual harassment.... The CCNO shall have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the CCNO.” Interviews with supervisory staff confirm that said rounds are being conducted at irregular times and in random patterns to increase the unpredictability of said rounds. Additionally, interviews with random staff and random inmates confirm that supervisory staff do conduct unannounced rounds. Documentation reviewed supports that said rounds are conducted in accordance to policy. Lastly, during the onsite review, supervisory staff were observed conducting unannounced rounds.

Reasoning & Findings Statement:

This standard requires the facility maintains adequate staffing levels, as well as considers the use of monitoring technology to help fortify those levels so as to promote the safety of not only the inmates assigned to the facility, but also the well-being of all correctional employees, contractors, and volunteers. It should be noted that the CCNO does contain video monitoring technology designated for this purpose. As an additional layer of protection, as well as to ensure meaningful and effective correctional supervision, intermediate and higher-level staff are required to routinely

	<p>conduct unannounced rounds throughout the institution. The auditor observed, as well as the facility provided, evidence of documented unannounced rounds of supervisory ranks of various levels, up to and including, the facility administrator. During the audit time frame, staffing levels have not fallen below the minimum requirements of the staffing plan. To ensure the CCNO staffing plan keeps pace with the changing nature of correctional facilities, the facility staffing plan is reviewed in coordination with the agency PREA Coordinator annually. As such, the CCNO has clearly met the minimum provisions of this standard.</p>
--	--

115.14 Youthful inmates	
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO 32003, Housing Inmates Under 18 Years of Age, 5-21-18 <p>Interviews:</p> <ul style="list-style-type: none"> · Agency PREA Coordinator · PREA Compliance Manager · Facility Administrator · Random Staff · Random Inmates <p>Site Review Observations:</p> <ul style="list-style-type: none"> • While conducting the onsite review, the auditor did not observe any inmates who appeared excessively youthful. • In reviewing inmate documents, the auditor did not observe any birthdays to be less than 18 years before the date of the onsite review.

- All inmates interviewed stated that they were at least 18 years of age and/or did not have any knowledge of any other inmates assigned to the CCNO who were not at least 18 years of age.

Standard Subsections:

(A) Per the Facility Administrator, the CCNO does not house any inmates less than 18 years of age. Agency policy explicitly mandates that CCNO “does not house inmates under the age of 18 years old.” Inmate interviews support that inmates under the age of 18 years of age are not confined at the CCNO.

(B) Per the Facility Administrator, the CCNO does not house any inmates less than 18 years of age. Agency policy explicitly mandates that CCNO “does not house inmates under the age of 18 years old.” Inmate interviews support that inmates under the age of 18 years of age are not confined at the CCNO.

(C) Per the Facility Administrator, the CCNO does not house any inmates less than 18 years of age. Agency policy explicitly mandates that CCNO “does not house inmates under the age of 18 years old.” Inmate interviews support that inmates under the age of 18 years of age are not confined at the CCNO.

Reasoning & Findings Statement:

This standard requires that the agency ensures sight and sound separation between inmates less than 18 years of age and inmates more than 18 years of age. Alternatively, the standard requires that there is direct staff supervision when inmates less than 18 years of age and inmates more than 18 years of age have the possibility of sight, sound, or physical contact. The CCNO prohibits the acceptance of inmates less than 18 years of age within the facility. Hence, by agency directive, the facility maintains an absolute and constant sight, sound, and physical barrier between inmates less than 18 years of age and inmates more than 18 years of age. This given, the CCNO meets the minimum requirements of this standard.

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

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #2300, Searches, 10-18-22
- CCNO #2018, Supervision, Cross Gender Supervision and Movement of Inmates, 1-18-24
- CCNO #4110, Transgender Inmates, 7-16-18
- CCNO Memo, 3-5-24
- CCNO Memo, 3-6-24
- CCNO Memo, 4-11-24
- CCNO Pre-Service Training, Lesson Plan, 8-14-20

Interviews:

Facility Administrator

- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Non-Medical Staff Involved in Cross-Gender Search Strip or Visual Search
- Random Staff
- Random Inmates
- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex

Site Review Observations:

- During the onsite inspection, inmates were observed being pat searched by persons of the same gender.
- During the onsite inspection, staff were routinely observed making cross-gender announcements when persons of the opposite gender entered inmate housing areas.

- Privacy shields were in place inhibiting view into most inmate toilets.
- Privacy shields were observed and/or available in medical examination rooms.
- Privacy curtains were observed in all shower areas.
- Video surveillance was not trained to areas where inmates might routinely be in a state of undress.

Standard Subsections:

(A) Policy #2300 requires that “the CCNO will not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning as search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.” It is further noted that “the CCNO will document all cross-gender strip searches and cross-gender visual body cavity searches, and will document all cross-gender pat-down searches of female inmates.” Documentation reflects adherence to policy. Interviews with facility staff, as well as random inmates, confirm that the facility does not engage in cross-gender strip or visual body cavity searches.

(B) Policy #2300 mandates that the “facility shall not permit cross-gender pat-down searches of female inmates, absent exigent circumstances.” It is further noted that the facility “shall not restrict female inmates’ access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.” Documentation reflects adherence to policy. Interviews with facility staff, as well as random female inmates, confirm that the facility does not engage in cross-gender pat-searches of female inmates. As well, random female inmates note that they have not been denied access to regularly available programming due to a lack of female staff available to conduct required pat-searches.

(C) Policy #2300 directs that “the CCNO will document all cross-gender strip searches and cross-gender visual body cavity searches, and will document all cross-gender pat-down searches of female inmates.” Documentation reflects that not such searches have occurred during the audit time frame. As well, both random staff and inmate interviews support that all searches have been conducted in accordance to policy.

(D) The CCNO does have policies and procedures in place to enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breast, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Additionally,

in accordance to policy (#2018), “staff of the opposite gender (are required) to announce their presence when entering an inmate housing unit. Female staff, when working a male unit, must announce themselves at the beginning of shift and when entering male bathroom, showers, etc.” It is further noted that in accordance to policy, “male staff will only supervise female inmates in an emergency situation or when female staff is not immediately available.” When interviewed, all random staff confirmed their adherence to announcement requirements. As well, during the onsite portion of the audit, the auditor did observe routine and regular opposite gender announcements being made. However, during the inmate interview process, five of the thirty-one inmates interviewed stated that opposite gender staff did not announce their presence upon entering opposite gender housing areas. To ensure staff compliance, additional training on all shifts was conducted to remind staff of this agency requirement, as well as the consequences of failing to follow agency protocol. During the facility site review, modesty barriers and curtains were generally in place to inhibit the viewing of any inmates in a state of undress. However, medical observation cells used for the general housing of inmates who required more frequent medical attention, did not have privacy screens for toilets. The facility noted large portable screens would be made available for temporary usage upon inmate request to ensure the availability of modesty screens for all toilets, regardless of their housing location. Lastly, a review of the facility’s video surveillance found that cameras were not trained to areas where inmates might routinely be in a state of undress.

(E) Policy #4110 notes that “the CCNO will not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. If the inmate’s genital status is unknown, it may be determined 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.” Documentation supports the facility’s adherence to policy. Interviewers with facility staff confirmed adherence to policy. When asked how one would become aware of this information if needed, most staff stated they would simply ask the inmate, or confer with agency records, and adhere to the information provided to them. All staff were aware that a physical search of the inmate could not be conducted to determine an inmate’s gender. At the time of the onsite audit, the CCNO only had one inmate assigned who identified as intersex/gender fluid. This individual stated that their person had not been physically searched to determine their genital status. As well, this individual stated that staff at the facility has asked about any concerns this individual may have for their physical safety.

(F) Per the CCNO PREA Coordinator, the agency does not permit staff to conduct cross-gender strip or pat down searches. Policy #4110 indicates that “the CCNO shall train security staff in how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates, in a professional and respectful manner, as in the least intrusive manner possible, consistent with security needs.” In speaking with random staff, it was noted that if the gender of an individual was not known, it could

be determined by checking agency records or by merely asking the inmate. All random staff interviewed stated that searches of all inmates, to include transgender inmates, are done professionally and in accordance to policy, as well as in the least intrusive manner as possible.

Reasoning & Findings Statement:

This standard requires that an agency place limits on cross-gender strip and visual body cavity searches. Accordingly, the agency has enacted policies prohibiting said searches. Rather, agency policy requires that when both males and female inmates are housed within the facility, the agency will have at least one male and one female staff member on duty at all times. During the audit time frame, the CCNO has not engaged any opposite-gender pat down, strip, or visual body cavity searches. Facility records reflect that all security staff have been trained on the proper procedures for conducting pat searches on transgender or intersex inmates, which require said searches to be performed in a professional and least intrusive manner as possible. During the onsite review, it was noted that the placement of privacy screens for toilets in medical housing cells would benefit the agency's zero-tolerance policy. Accordingly, these screens were installed. As such, no further action is needed concerning such. An extensive review of live video surveillance demonstrates that cameras are not trained in areas where inmates would routinely be in a state of undress. The agency requires opposite gender staff to announce their presence upon entering housing areas. During the onsite portion of the audit process, this announcement was routinely observed as opposite gender staff entered all housing areas, as well as any other area that might contain inmates in any state of undress. However, during inmate interviews, a few inmates stated that said announcements were not being made. To ensure staff compliance, additional training on all shifts was conducted to remind staff of this agency requirement, as well as the consequences of failing to follow agency protocol. As such, no further action is needed concerning such. Lastly, an extensive review of live video surveillance demonstrates that cameras are not trained in areas where inmates would routinely be in a state of undress. Accordingly, the CCNO has meet the minimum requirements of this standard.

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

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #4108, Americans with Disabilities Act, 9-26-22
- CCNO Staff Lesson Plan, ADA, 8-14-20
- CCNO PREA Orientation Video
- CCNO Zero Tolerance Poster, English
- CCNO Zero Tolerance Poster, Spanish
- CCNO Zero Tolerance Poster, Right to Report, English
- CCNO Zero Tolerance Poster, Right to Report, Spanish
- CCNO PREA, Prevent, Detect, & Respond Poster, English
- CCNO PREA, Prevent, Detect, & Respond Poster, Spanish
- CCNO PREA, Report Sexual Assault Poster, English
- CCNO PREA, Report Sexual Assault Poster, Spanish
- CCNO Memo and Interpreter Information, 3-6-24
- CCNO Pre-Service Training with Test, 11-10-23
- CCNO Listing of Bilingual Staff
- CCNO Inmate Rules of Conduct and Handbook, English, 2023
- CCNO Inmate Rules of Conduct and Handbook, Spanish, 2021
- CCNO PREA Pamphlet, English, 10-12-18
- CCNO PREA Pamphlet, Spanish, 10-12-18
- CCNO Memo, No Inmate Interpreters Used, 3-6-24
- CCNO Inmate Orientation Acknowledgement: 2-27-23, 3-23-23, 4-3-23, 4-6-23, 4-28-23, 5-19-23, 6-16-23, 8-10-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-18-23a, 10-18-23b, 11-25-23, 1-25-24, 1-30-24, 2-5-24, 2-24-24, 5-19-24, 8-2-24, 8-5-24
- CCNO PREA Survey: 2-27-23, 3-23-23, 4-6-23a, 4-6-23b, 4-28-23, 5-19-23a, 5-19-23b, 6-1-23, 6-16-23, 8-22-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-18-23a, 10-18-23b, 11-27-23, 1-30-24, 2-5-24, 2-24-24, 7-17-24, 8-2-24, 8-5-24

· CCNO Booking Summary: 2-27-23, 3-23-23, 4-4-23, 4-6-23, 4-28-23, 5-19-23, 6-16-23, 8-22-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-18-23a, 10-18-23b, 11-25-23, 1-25-24, 1-30-24, 2-5-24, 2-24-24, 5-19-24, 7-17-24, 8-2-24, 8-5-24

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Random Staff
- Inmates with Disabilities
- Inmates with Limited English Proficiency

Site Review Observations:

- Correctional staff assigned to housing areas entered each area within the building to loudly announce information, to include when opposite gender staff entered the housing area.
- PREA Notices, as well as other advisement notices, were posted in languages spoken by significant portions of the inmate population; namely English and Spanish.
- PREA information is also available in large print
- Each officer's Guardian RFID contains a Google Translation App to communicate with inmates who do not speak English.
- The Guardian RFID allows for translation through text, conversation, photo, and handwriting to assist with in communicating with inmates with disabilities.
- The facility utilizes Interpreter.com as needed.
- Staff translators are also available if needed.

Standard Subsections:

(A) The CCNO has developed a policy; namely, #4108, "to ensure that inmates with disabilities (including, for example), inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities, have an equal opportunity to participate in or benefit from all aspects of the CCNO's efforts to prevent, detect, and respond to sexual abuse and sexual harassment." PREA educational information is provided in writing, verbally, as well as presented in video format (available in English and Spanish). The CCNO utilizes translation services to assist inmates who do not speak a language common to CCNO staff. In this, said services can be used to translate PREA, as well other confidential information. As well, the agency utilizes the Guardian RFID, which allows for translation through text, conversation, photo, and handwriting to assist with in communicating with inmates with disabilities.

When interviewing staff, employees were aware of the need to obtain staff interpreters for sensitive security matters, such as PREA related investigations. All staff were aware that other inmates could not be used to translate for any inmate during a sexual abuse or sexual harassment investigation or incident. During the audit time frame, there have not been any (0) instances of CCNO using inmate interpreters for PREA related matters. Inmates with limited English proficiency were interviewed. As well, inmates with physical and/or intellectual disabilities were interviewed. These persons all stated that their disabilities did not prevent them from participating in any facility-based services or that CCNO has made accommodations for their disabilities, to include making accommodations for the agency's responsibility in preventing, detecting, and responding to instances of sexual abuse and sexual harassment. Documentation review found that while the accommodations were being made, agency forms did not consistently reflect that those accommodations provided to inmates were consistently recorded. Accordingly, a change in protocol was initiated to reflect any accommodations provided, such as translation services offered for PREA education/assessments at Intake, would be notes on the appropriate forms. A review of documentation subsequent the onsite portion of the audit reflects said consistency. As such, compliance with this new protocol is clearly institutionalized and no further action is warranted.

(B) The agency has taken reasonable steps to ensure meaningful access to all aspects of the agency's effort to prevent, detect, and respond to sexual abuse and sexual harassment of inmates who have limited English proficiency, to include access to qualified interpreters for effective translations. The PREA informational brochure is printed in two different languages: English and Spanish. As well, per the PREA Coordinator, the PREA educational video can also be seen by inmates in those

languages. Staff translators, as well as the Guardian RFID Translation App, are available to assist with inmates having limited English proficiency or other disabilities. As needed, translator language line services can also be used to translate PREA information into other languages.

(C) Per the Agency PREA Coordinator, the agency does not rely on inmates to interpreter, read, or otherwise provide assistance to other inmates specific to allegations of sexual abuse or sexual harassment. Rather, CCNO policy mandates that “the CCNO shall not rely on inmate interpreters, inmate readers, other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate’s safety, the performance of first responder duties under section 115.64, or the investigation of the inmate’s allegations.” As noted during interviews with facility staff, CCNO staff are aware of agency policy and do not utilize inmate interpreters for security sensitive matters. Documentation reflects that during the audit time frame, the CCNO did not utilize inmate interpreters to provide assistance to other inmates specific to allegations of sexual abuse or sexual harassment.

Reasoning & Findings Statement:

This standard grants all inmates 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. An essential component to that requirement is the ability to access PREA information, services, and support services. Inmates with disabilities; either cognitive, physical, or cultural, may require additional assistance in achieving said access. Hence, it is necessary for the agency to provide additional measures to ensure said inmates have equal access. The CCNO recognizes this need and has created policies and procedures to address it. The CCNO routinely stocks and maintains sufficient amounts of facility handbooks and PREA informational pamphlets in both English and Spanish. As well, the handbooks and PREA pamphlets are continuously available on inmate tablets in both English and Spanish. The PREA educational video is continuously available on all inmate tablets in both English and Spanish. Additionally, at 0850 every morning, it is announced, in both English and Spanish, that the PREA video will be shown on dayroom televisions at 0900 hours. The video was subsequently observed playing in both English and Spanish as announced. Lastly, it should be noted that at no time within the audit time frame has CCNO used inmate interpreters to help agency staff communicate with other inmates regarding allegations of sexual abuse and sexual harassment. Rather, when needed, staff commonly use staff interpreters or other translation services for communication with inmates who have limited English proficiency or other communication barriers. However, documentation review found that while the accommodations were being made, agency forms did not consistently reflect that those accommodations provided to inmates were consistently recorded. Accordingly, a change in protocol was initiated

to reflect any accommodations provided, such as translation services offered for PREA education/assessments at Intake, would be noted on the appropriate forms. A review of documentation subsequent the onsite portion of the audit reflects said consistency. As such, compliance with this new protocol is clearly institutionalized and no further action is warranted. With this in mind, the facility has clearly met all provisions within this standard.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #6004, Filling of Positions, 11-9-21 · CCNO #6006, Pre-Employment Screening/Hiring Process, 11-9-21 · CCNO Employee Criminal/Traffic History Check: 6-30-05, 4-5-16, 1-23-23, 4-21-23 · CCNO Contractor Criminal/Traffic History Check: 3-6-23 · CCNO Volunteer Criminal/Traffic History Check: 7-6-23 · CCNO Employee, Contractor, and Volunteer Background Checks: 11-3-14, 7-15-19, 2-2-23, 2-1-24, 2-16-24, 2-20-24, 4-4-24, 4-5-24, 4-29-24, 5-17-24, 5-21-24, 5-23-24a, 5-23-24b · CCNO PREA Training: 7-30-20, 8-4-20, 11-16-21, 12-13-21, 12-31-22a, 12-31-22b, 1-25-23, 2-24-23, 3-3-23, 4-27-23, 5-16-23, 5-26-23, 9-8-23, 10-11-23, 10-25-23a, 10-25-23b, 10-27-23, 12-31-23a, 12-31-23b, 2-1-24 · CCNO Monthly Self Training Signature Sheet: 8-3-23a, 8-3-23b, 8-5-23, 8-11-23, 1-16-24 · CCNO Contractor PREA & Staff Misconduct Post-Test: 5-16-23 <p>Interviews:</p>

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Administrative (Human Resources) Staff

Site Review Observations:

- Review of 4 employee files onsite for required PREA training/criminal background documentation.
- Review of 2 volunteer and contractor files onsite for required PREA training/criminal background documentation.
- Review of CCNO employee PREA training tracking spreadsheet

Standard Subsections:

(A) The CCNO has developed policy (#6004) that prohibits the hiring or promoting anyone who has been “convicted of a felony, sexual abuse, or engaged in sexual activity in a custodial setting.” Additionally, per policy, “the CCNO will not hire, promote, or enlist the services of any contractor who may be contact with offenders, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution” (#6004). Per CCNO Human Resource staff, prior to hiring any new employee or contract worker at the facility level, CCNO Human Resource staff shall ensure that criminal background checks have been conducted on the prospective employee. As well, as required by policy, CCNO/CCNO Human Resource staff ensure that all previous institutions of employment are contacted to determine if candidates have any previously substantiated claims of sexual abuse or resigned during a pending investigation of such claims.

Documentation review supports criminal background checks are completed prior to enlisting the services of any employee or contractor.

(B) CCNO policy (#6004) requires the facility to “consider any incidents of sexual harassment in determining whether to hire/promote anyone, or enlist the services of any contractor, who may have contact with offenders.” In speaking with the CCNO Human Resource representative, strict adherence to said policy is maintained.

(C) Before hiring or promoting employees, policy (#6006) requires “the CCNO will perform a criminal background records check; and 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.” Within the audit time frame, CCNO has hired 49 persons who may have contact with inmates. Per CCNO Human Resource staff, all such persons received a criminal records background check. Documentation review supports criminal background checks are completed prior to enlisting the services of any employee or contractor.

(D) Agency policy (#6006) requires that prior to enlisting the services of any contractors who may have contact with inmates, the agency performs criminal background records checks on said contractors. Within the audit time frame, CCNO has hired 13 contractors who may have contact with inmates. Per CCNO Human Resource staff, all such persons have received a criminal records background check. Documentation review supports criminal background checks are completed prior to enlisting the services of any employee or contractor.

(E) Once employed, agency policy (#6006) requires that criminal background checks are conducted every five years to ensure that employees have not been found to have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. As well, per CCNO Human Resource staff, employees have an affirmative duty to report any contact they may have had with other law enforcement agencies and to report any sexual misconduct they may have been found guilty of at any other institution. Furthermore, as explained by CCNO Human Resource staff, employees are made aware that failing to provide this information, or providing false information regarding sexual misconduct, is grounds for employee discipline, to include termination of employment. Documentation review supports criminal background checks are completed prior to enlisting the services of any employee. As well, subsequent checks are conducted every five years for all employees per policy (#6006). In excess of the PREA Standards, CCNO policy (#6006) further requires that “contractors and volunteers who may have contact with inmates will have a criminal background check at least once a year.”

(F) Policy (#6006) mandates that “the CCNO will ask all applicants, employees, contractors, and volunteers who may have contact with inmates directly about previous misconduct described in Policy #6004 (Filling of Positions) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The CCNO shall also impose upon employees, contractors, and volunteers a continuing affirmative duty to disclose any such misconduct.” Review of documentation specific to CCNO’s

	<p>PREA disclosure requirements confirms the facility’s adherence to said policies.</p> <p>(G) As required by policy (#6006) and stressed by CCNO Human Resource staff, “material omissions regarding such misconduct, or the provision of materially false information, shall be ground for termination.” Review of documentation specific to CCNO’s PREA disclosure requirements confirms the facility’s adherence to said policies.</p> <p>(H) As noted by CCNO Human Resource staff, agency policy allows that unless prohibited by law, the CCNO shall 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</p> <p>Reasoning & Findings Statement:</p> <p>This standard requires the agency to consider the sexual safety of inmates in all hiring and promotion decisions within the agency. The agency has policies in place to ensure that end. It should be noted that while the PREA Standards require subsequent employee and contractor reviews be conducted in five-year intervals, the CCNO exceeds that requirement by conducting contractor reviews on an annual basis. Additionally, the CCNO exceeds the PREA standards by not only conducting initial criminal background checks on all volunteers, but also performs subsequent annual checks on all volunteers. To this effect, the CCNO Human Resource Department has developed standardized tracking methods to ensure timely reviews, and subsequent reviews, of applicants and continuing employees, contractors, and volunteers are conducted as required by policy. Review of employee and contractor training files reflect that the CCNO Human Resource Department complies with agency policy. Accordingly, the CCNO has exceeded the minimum requirements of this standard.</p>
--	--

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21

- CCNO #2016, Security System Cameras, 11-19-20
- CCNO PREA Annual Report, 2023
- CCNO Memo, Description of Video or Electronic Monitoring Technology, 3-20-24
- CCNO Memo, Staffing Plan Review, 3-5-24
- CCNO Memo, Staffing Plan Review, 2-8-23
- CCNO Memo, Staffing Plan Review, 3-2-22

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator

Site Review Observations:

- Observed video monitoring technologies present within the facility.
- Reviewed live video surveillance across the facility.

Standard Subsections:

(A) Per the CCNO Warden, the CCNO has not acquired a new facility or made any substantial expansion or modification to the existing facility since the last PREA audit.

(B) The CCNO has updated the video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit, namely, through the installation of additional cameras throughout the facility.

	<p>Reasoning & Findings Statement:</p> <p>Within the audit time frame, CCNO has not designed or constructed any substantial modification of the existing facility. As a function of its annual staffing review, the CCNO does consider, among other factors, generally accepted correctional practices and the use of video monitoring technologies. Currently, the CCNO has numerous cameras that provide sufficient coverage throughout the institution. A review of camera footage does not reflect cameras to be trained in any area where inmates would normally be in a state of undress. In all staffing decisions, as well as decisions involving the use of video monitoring technology the CCNO has worked to maximize the facility's ability to protect inmates from sexual abuse. As such, the CCNO has meet all provisions within this standard</p>
--	--

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #5001, Internal Investigations, 3-28-23 · CCNO # 5005, Criminal Activity on CCNO Property, 4-20-21 · CCNO Memo, Criminal Investigations, 5-8-24 · CCNO MOU Williams County Sheriff's Office, 5-7-21 · CCNO Williams County Sheriff, SOP Sexual Assault Investigations, 2-6-09 · CCNO Memo, SANE Exams, 4-11-24 · CCNO Memo, SANE Exams, 4-25-24 · CCNO Incident Report, 10-19-23 · CCNO Williams County Victim Assistance MOU, 4-19-21 · CCNO Williams County Victim Assistance MOU, 2-12-24 · CCNO Licensed Social Worker, 5-31-22 · CCNO Ohio Professional License: 5-31-22, 12-6-22, 6-27-23

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Investigative Staff
- Random Staff
- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel of Parkview Bryan Hospital
- Williams County Victim Assistance
- The Center for Child and Family Advocacy

Site Review Observations:

- Observed Medical Department and privacy screens/limitations.
- Observed interview rooms and protocol for confidential interviews.
- Reviewed Williams County Victim Assistance Website
- Reviewed The Center for Child and Family Advocacy Website

Standard Subsections:

(A) CCNO policy (#5002) notes that “to the extent the CCNO is responsible for investigating allegations of sexual abuse, the CCNO shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.” As noted within policy (#5005), “at a minimum, the procedures shall address the following: chain of custody, evidence handling and location and storage requirements and manner of disposition.” In speaking with investigative staff, adherence to this policy is strictly

maintained.

(B) While the CCNO does not house youthful offenders, the protocol use is developmentally appropriate for youth. Specifically, as noted by the PREA Coordinator, CCNO policy requires the agency to utilize the U.S. Department of Justice's Office on Violence Against Women protocol; namely, A National Protocol for Sexual Assault Medical Forensic Examination, Adults/Adolescents as the evidence collection protocol manual.

(C) In accordance with agency policy (#5002), "the CCNO shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The CCNO shall document its efforts to provide SAFEs or SANEs." As noted by Medical personal, persons with acute trauma are generally taken to Parkview Bryan Hospital, which operates as a verified trauma center. As noted by Parkview Bryan Hospital staff, qualified SAFE/SANE nursing staff are either on duty or on call 24 hours a day, seven days a week. However, per SART Clinic staff, if inmates do not present with acute trauma, they are taken directly to the SART clinic, where qualified SAFE/SANE nursing staff are either on duty or on call 24 hours a day, seven days a week. Per the PREA Coordinator, within the audit time frame, the CCNO has facilitated one such exam. However, it should be noted that the allegations of sexual abuse occurred prior to the inmate's arrest and subsequent incarceration. Nonetheless, when CCNO became aware of the allegations, the sexual abuse protocol was immediately enacted.

(D) Agency policy (#5002) requires that the CCNO shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the CCNO shall make available to provide these services a qualified staff member from a community-based organization, or a qualified CCNO staff member." Per the PREA Compliance Manager, the CCNO has a memorandum of understanding with the Williams County Victim Assistance Program to provide immediate advocacy in any community hospital of Williams County. The Williams County Victim Assistance Program is a governmental unit not with the county's criminal justice agencies. Rather, it is a standalone governmental body that provides for criminal justice support and advocacy at all stages of the criminal justice process. As well, the Williams County Victim Assistance Program provides for a sexual abuse reporting hotline, along with confidential emotional support services related to the sexual abuse while the inmate is incarcerated and continuing after their release. After incarceration, an advocate may offer financial assistance and referrals for transportation, food, clothing, emergency

housing, and other basic needs. Additionally, inmates are also given advocacy assistance from The Center for Child and Family Advocacy when incarcerated at CCNO. As noted on the agency's website, the CCFA provides services to address general mental health issues, such as depression and anxiety, for children, adolescents and adults. In addition, the agency specializes in responding to, advocating for, and assisting in the healing of individuals who have experienced trauma and abuse. As well, agency staff have been trained to provide advocacy services if community advocacy members are not available.

(E) In accordance with policy (#5002), and as requested by the victim, a qualified staff member or local rape crisis center advocate may remain with the inmate through the forensic medical examination process and investigatory interviews. As requested, this person may provide emotional support, crisis intervention, information, and referrals.

(F) Agency policy (#5002) mandates that the CCNO may conduct administrative investigations into allegations of sexual abuse and sexual harassment. Criminal investigations are conducted by Williams County Sheriff. To this effect, CCNO policy, as well as an MOU in effect with the Williams County Sheriff Office, does ask that the Williams County Sheriff Office comply with the investigatory and evidence protocol of the PREA Standards.

(G) The auditor is not required to audit this provision.

(H) Only qualified staff members may serve as advocacy personnel. Per the PREA Compliance Manager, all such staff have been appropriately screened and trained for that purpose. Through a memorandum of understanding with the local rape crisis center, Williams County Victim Assistance Program, as well as through the use of another local advocacy center; namely The Center for Child and Family Advocacy, and through the use of its own qualified staff, the CCNO has ensured that all persons who have contact with CCNO inmates have been appropriately screened and trained, along with having received education concerning sexual assault and forensic examination issues in general.

Reasoning & Findings Statement:

This standard concerns evidence protocol and forensic medical examinations. The CCNO has policies in place to ensure proper accountability during the investigation, evidence collection, and the forensic exam process. A memorandum of understanding

	<p>(MOU) exists between the CCNO and the Williams County Sheriff Office to ensure all criminal investigations are conducted in accordance with the PREA Standards. During the audit time frame, the CCNO has initiated the evidence protocol and forensic medical examination process once. However, it should be noted, that this examination was not engaged as a product of the PREA process within the facility. Rather, the CCNO provided said services to an inmate who had been sexually assaulted shortly prior to incarceration. As evidenced during the interview process, facility staff are very much aware of the policies and have standard practices in place to ensure the proper flow of the investigation process. As well, a MOU is in force between the CCNO and the Williams County Victim Assistance Program to ensure that inmates are afforded access to a local victim's advocate at the start of any forensic exam, through their incarceration period, and continuing once released. Additionally, advocacy services are also available to inmates through another local rape crisis center; namely, The Center for Child and Family Advocacy. Lastly, the CCNO has trained staff who can service as victim's advocates, if needed. As such, the CCNO has met the requirements of this standard.</p>
--	---

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #5001, Internal Investigations, 3-28-23 · Williams County Sheriff, Standard Operating Procedure, Sexual Assault No. 6.10, 2-6-09 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Head • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Investigative Staff

- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel
- Williams County Victim Assistance
- The Center for Child and Family Advocacy
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Observed Medical Department and privacy screens/limitations.
- Observed interview rooms and protocol for confidential interviews.
- Reviewed twelve investigation files.
- Reviewed agency website.

Standard Subsections:

(A) CCNO policies (#5002, #5001, #5005) require that administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. Within the audit time frame, the CCNO has received twelve (12) allegations of sexual abuse and sexual harassment, with one (1) such allegation being referred for criminal investigation.

(B) The CCNO refers all criminal allegations of sexual abuse and sexual harassment to the Williams County Sheriff Office, an external law enforcement agency with legal authority to conduct criminal investigations. The CCNO has published this policy on the agency website. All referrals to the Williams County Sheriff Office are documented by the agency.

(C) CCNO policies (#5002, #5001, #5005) require that administrative and/or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. Per the facility investigator, as well as noted on the agency's website, criminal investigations are referred to the Williams County Sheriff Office. Whereas administrative investigations are conducted by CCNO investigators.

(D) CCNO policy (#5002), as well as the MOU in effect, requires that the Williams County Sheriff Office conduct its investigations in accordance with the PREA Standards. The Williams County Sheriff Office does conduct its investigations in accordance with its agency policy, as well as CCNO policy (#5005).

(E) The auditor is not required to audit this provision.

Reasoning & Findings Statement:

This standard ensures that proper referrals of allegations are made for further investigations by an agency with proper authority to conduct criminal investigations. The CCNO does have appropriate policies in place mandating referrals in specific instances. Within the audit time frame, the CCNO has referred all required allegations of sexual abuse and sexual harassment that it has received to the Williams County Sheriff Office, which has legal standing to investigate criminal allegations. In interviewing CCNO investigative staff, it was clear that CCNO staff refer all required investigations to the Williams County Sheriff Office for further processing in accordance with policy. As such, the CCNO complies in all material ways with this standard for the relevant review period.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #6101, Staff Training – Full Service Jail, 2-15-23 · CCNO Pre-Service Training Lesson Plan with PREA & Staff Sexual Misconduct Post-Test, 5-3-18 · CCNO Staff Training, Pre-Service Record: 11-10-23

- CCNO Staff Training, PREA Trainings: 3-29-24, 6-25-24a, 6-25-24b, 6-25-24c, 6-25-24d
- CCNO Monthly Self Training Signature Sheet, August 2023: 8-3-23a, 8-3-23b, 8-5-23, 1-16-24
- CCNO Officer 1st PREA Training: 10-11-23, 10-25-23a, 10-25-23b, 10-27-23
- CCNO Staff Training PREA & Staff Sexual Misconduct Post-Test: 11-3-23, 1-10-24

Interviews:

Facility Administrator

- PREA Compliance Manager
- Administrative (Human Resources) Staff
- Medical Staff
- Mental Health Staff
- Random Staff

Site Review Observations:

- Random review of four (4) employee files onsite, as well as matched review of employee files to employees interviewed, to confirm documentation of required PREA training.
- Review of CCNO employee PREA training tracking spreadsheet

Standard Subsections:

(A) CCNO policy (#6101) requires all employees to be fully trained on the agency's zero-tolerance policy for sexual abuse and sexual harassment. As verified by Human Resource staff, such training is initially performed as a function of the hiring process. This zero-tolerance training is a comprehensive analysis of agency policy and the PREA standards. A review of training curriculum for this class reflects the agency's zero-tolerance policy for sexual abuse and sexual harassment, and discussion on how employees may fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.

Employees are also informed that inmates have a right to be free from sexual abuse and sexual harassment, to be free from retaliation for reporting said abuse and harassment, the dynamics of sexual abuse/harassment, reactions to sexual abuse/harassment, how to detect and respond to signs of threatened and actual sexual abuse, how to avoid inappropriate relationships with inmates, how to comply with relevant mandatory reporting laws specific to reporting abuse to outside authorities, and how to communicate effectively and professionally with inmates; including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates. During random staff interviews, all employees confirmed receipt of said training. A random review of four (4) employee files confirmed receipt of said training for all employee files reviewed.

(B) The CCNO houses both male and female inmates. Training curriculum reviews demonstrate that the material is appropriate for both male and female inmates.

(C) A review of CCNO PREA Training Completion Report reflects that all actively employed staff have received their initial PREA training, as well as continued training as appropriate based on agency policy (#6101). Following this initial training, subsequent refresher trainings are provided to staff on a yearly basis. A review of the CCNO PREA Training Completion Report reflects continuing training schedules have all been maintained.

(D) All training is documented, including an employee's signature, with post-training assessments provided to ensure employees' effective comprehension of the information discussed.

Reasoning & Findings Statement:

This standard relates to employee training. The agency has clearly established training expectations and well-developed training curriculums. CCNO maintains compliance with those imperatives with 100% of its staff having received required PREA training. All training is documented upon completion with employee signatures and CCNO maintaining an overall master list of all staff having completed said training. During staff interviews, all employees affirmed their having received significant amounts of training as related to the PREA standards. When asked the series of questions noted within Subsection A of this standard, all staff knew and understood their responsibilities within the agency's zero-tolerance policy. As such, CCNO has clearly met the requirements of this provision.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #6101, Staff Training - Full Service Jail, 2-15-23 · CCNO #6101-C Attachment, Security and Safety Rules for Contractors/Vendors Working on CCNO grounds and/or within the Security Perimeter, 2-15-23 · CCNO #4500, Volunteer, 11-7-23 · CCNO Volunteer Orientation Lesson Plan, 12-28-21 · CCNO Volunteer Orientation Training: Sexual Assault, Sexual Misconduct and PREA, PowerPoint Slides · CCNO Volunteer Orientation Final Exam · CCNO PREA & Staff Misconduct Post-Test · CCNO Event Report for Contract Staff: 1-5-24, 1-11-24, 1-15-24 · CCNO Pre-Service Training for Contract Staff: May 15-26, 2023; January 8-19, 2024 · CCNO PREA & Staff Sexual Misconduct Post-Test for Contract Staff: 5-16-23, 1-10-24 · CCNO PREA Employee Acknowledgement for Contact Staff: 1-11-24 · CCNO Contract Staff Agreement, 1-5-24 · CCNO Volunteer Orientation Final Exam: 7-6-23, 8-22-23 · CCNO Volunteer Agreement: 7-6-23, 8-23-23 · CCNO PREA Employee Acknowledgement for Volunteers: 7-6-23, 8-22-23 · CCNO #6101-C Attachment, Security and Safety Rules for Contractors/Vendors Working on CCNO grounds and/or within the Security Perimeter, for Contractor: 1-8-24 · CCNO Monthly Self Training Signature Sheet, August 2023: 8-11-23 <p>Interviews:</p>

Facility Administrator

- PREA Compliance Manager
- Administrative (Human Resources) Staff
- Contractors Who May Have Contact with Inmates
- Volunteers Who May Have Contact with Inmates

Site Review Observations:

- Review of 2 contractor and volunteer files onsite, as well as matched review of contractor/volunteer files to contractor/volunteer interviewed, to confirm documentation of required PREA training.
- Review of CCNO contractor/volunteer PREA training tracking spreadsheet

Standard Subsections:

(A) CCNO policy (#4500) requires that “all volunteers who have contact with inmates have been trained on their responsibilities under the CCNO’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The level and type of training provided to volunteers shall be based on the services they provide and level of contact they have with inmates, but all volunteers who have contact with inmates shall be notified of the CCNO’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.” At the time of the audit, the CCNO has had 381 volunteers and contract workers present in the facility within the audit time frame who could have had contact with inmates. As affirmed by the CCNO PREA Compliance Manager, 100% of those persons have received appropriate PREA training, dependent on their level of contact with inmates, prior to their entrance into the facility. Additionally, it was noted that in excess of the PREA Standards, contractors received PREA training on an annual basis. When interviewed, both contractors and volunteers confirmed their initial receipt of PREA training, as well as subsequent annual trainings by contracted staff. Volunteer and contractor files were reviewed onsite for receipt of required training documentation.

(B) As affirmed by the CCNO PREA Compliance Manager, all volunteers and contract workers have received PREA training appropriate for their role on the facility. When interviewed, both volunteers and contract workers stated that they had been made

aware of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. They further stated that if the need arose, they could report an incident of sexual abuse or sexual harassment to their supervisor or a security staff member. Volunteer and contractor files were reviewed onsite for receipt of required training documentation.

(C) Volunteers and contractors are required to receive PREA training prior to working/volunteering within the facility. After receipt of training, contractors and volunteers sign an acknowledgement form indicating the date and that they understood the training that they had received. The facility then maintains a copy of all training files belonging to both volunteers and contractors. When asked, volunteers and contract workers all confirmed that they had received PREA training prior to their actual start date with the agency. Volunteer and contractor files were reviewed onsite for receipt of required training documentation.

Reasoning & Findings Statement:

The CCNO requires all volunteers and contractors to receive formal training on the agency's zero-tolerance policy for sexual abuse and sexual harassment. Along with meaningful training on the agency's zero-tolerance policy, said persons must also be informed of how to report any knowledge they may have regarding such abuse. Lastly, the standard requires that the agency maintain appropriate training records to verify that volunteers and contractors understood the training that they had received. As with employee training, the CCNO has ensured both volunteers and contractors conducting business on the facility have received initial and subsequent PREA trainings where appropriate, as well as maintained documentation of those trainings. In speaking with volunteer and contracted personnel, all persons stated that they have received said training. They further noted their understanding of the nature of the PREA, along with their own roles within it. Lastly, all contractors and volunteers interviewed were also able to articulate their responsibilities within the zero-tolerance policy specific to reporting acts of sexual abuse and sexual harassment. As such, CCNO has clearly exceeded the requirements of this standard.

115.33	Inmate education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #2100, Intake, 11-15-23
- CCNO #4101, Classification of Inmates, 3-2-23
- CCNO #4108, Americans with Disabilities Act, 9-26-22
- CCNO Memo, Inmate Education, 5-2-24
- CCNO Memo, Inmate Education, 3-20-24a
- CCNO Memo, Inmate Education, 3-20-24b
- CCNO PREA Orientation Video
- CCNO Zero Tolerance Poster, English
- CCNO Zero Tolerance Poster, Spanish
- CCNO Zero Tolerance Poster, Right to Report, English
- CCNO Zero Tolerance Poster, Right to Report, Spanish
- CCNO PREA, Prevent, Detect, & Respond Poster, English
- CCNO PREA, Prevent, Detect, & Respond Poster, Spanish
- CCNO PREA, Report Sexual Assault Poster, English
- CCNO PREA, Report Sexual Assault Poster, Spanish
- CCNO Memo and Interpreter Information, 3-6-24
- CCNO Inmate Rules of Conduct and Handbook, English, 2023
- CCNO Inmate Rules of Conduct and Handbook, Spanish, 2021
- CCNO PREA Pamphlet, English, 10-12-18
- CCNO PREA Pamphlet, Spanish, 10-12-18
- CCNO Inmate Orientation Acknowledgement: 2-27-23, 3-23-23, 4-3-23, 4-6-23, 4-28-23, 5-10-23, 5-19-23, 6-16-23, 8-10-23, 8-25-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-12-23, 10-18-23a, 10-18-23b, 11-25-23, 12-12-23, 12-13-23, 1-2-24a, 1-2-24b, 1-2-24c, 1-2-24d, 1-25-24, 1-30-24, 2-1-24a, 2-1-24b, 2-1-24c, 2-1-24d, 2-1-24e, 2-2-24a, 2-2-24b, 2-2-24c, 2-2-24d, 2-2-24e, 2-2-24f, 2-2-24g, 2-2-24h, 2-2-24i, 2-2-24j, 2-2-24k, 2-2-24l, 2-2-24m, 2-3-24a, 2-3-24b, 2-4-24, 2-5-24a, 2-5-24b, 2-5-24c, 2-5-24d, 2-5-24e, 2-5-24f, 2-5-24g, 2-5-24h, 2-5-24i, 2-5-24j, 2-6-24a, 2-6-24b, 2-6-24c, 2-6-24d, 2-6-24e, 2-6-24f, 2-7-24a, 2-7-24b, 2-7-24c, 2-8-24a, 2-8-24b, 2-8-24c, 2-8-24d, 2-8-24e, 2-8-24f, 2-9-24a, 2-9-24b, 2-9-24c,

2-9-24d, 2-9-24e, 2-9-24f, 2-9-24g, 2-9-24h, 2-9-24i, 2-15-24a, 2-15-24b, 2-15-24c, 2-15-24d, 2-16-24a, 2-16-24b, 2-16-24c, 2-16-24d, 2-16-24e, 2-16-24f, 2-16-24g, 2-17-24a, 2-17-24b, 2-17-24c, 2-17-24d, 2-18-24, 2-19-24a, 2-19-24b, 2-20-24a, 2-20-24b, 2-20-24c, 2-20-24d, 2-20-24e, 2-20-24f, 2-20-24g, 2-20-24h, 2-21-24a, 2-21-24b, 2-21-24c, 2-21-24d, 2-21-24e, 2-21-24f, 2-22-24a, 2-22-24b, 2-23-24a, 2-23-24b, 2-23-24c, 2-23-24d, 2-23-24e, 2-23-24f, 2-24-24, 3-25-24, 3-26-24, 5-1-24, 5-17-24, 5-19-24, 5-24-24, 6-10-24, 6-18-24, 6-20-24, 8-2-24, 8-5-24

· CCNO Booking Summary: 2-27-23, 3-23-23, 4-4-23, 4-6-23, 4-28-23, 5-19-23, 6-16-23,

8-22-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-18-23a, 10-18-23b, 11-25-23, 1-1-24, 1-2-24a, 1-2-24b, 1-2-24c, 1-2-24d, 1-25-24, 1-30-24, 2-1-24a, 2-1-24b, 2-1-24c, 2-1-24d, 2-1-24e, 2-2-24a, 2-2-24b, 2-2-24c, 2-2-24d, 2-2-24e, 2-2-24f, 2-2-24g, 2-2-24h, 2-2-24i, 2-2-24j, 2-2-24k, 2-2-24l, 2-2-24m, 2-3-24a, 2-3-24b, 2-4-24, 2-5-24a, 2-5-24b, 2-5-24c, 2-5-24d, 2-5-24e, 2-5-24f, 2-5-24g, 2-5-24h, 2-5-24i, 2-5-24j, 2-6-24a, 2-6-24b, 2-6-24c, 2-6-24d, 2-6-24e, 2-6-24f, 2-7-24a, 2-7-24b, 2-7-24c, 2-8-24a, 2-8-24b, 2-8-24c, 2-8-24d, 2-8-24e, 2-8-24f, 2-9-24a, 2-9-24b, 2-9-24c, 2-9-24d, 2-9-24e, 2-9-24f, 2-9-24g, 2-9-24h, 2-9-24i, 2-15-24, 2-16-24a, 2-16-24b, 2-16-24c, 2-16-24d, 2-16-24e, 2-16-24f, 2-16-24g, 2-16-24h, 2-16-24i, 2-16-24j, 2-17-24a, 2-17-24b, 2-17-24c, 2-17-24d, 2-18-24, 2-19-24, 2-20-24a, 2-20-24b, 2-20-24c, 2-20-24d, 2-20-24e, 2-20-24f, 2-20-24g, 2-20-24h, 2-21-24a, 2-21-24b, 2-21-24c, 2-21-24d, 2-21-24e, 2-21-24f, 2-22-24a, 2-22-24b, 2-23-24a, 2-23-24b, 2-23-24c, 2-23-24d, 2-23-24e, 2-23-24f, 2-24-24, 5-19-24, 7-17-24, 8-2-24, 8-5-24

· CCNO Comprehensive PREA Education and Survey: 2-27-23, 3-23-23, 4-6-23a, 4-6-23b, 4-28-23, 5-10-23, 5-19-23a, 5-19-23b, 6-1-23, 6-16-23, 8-22-23, 8-25-23, 9-8-23, 9-19-23, 9-25-23, 10-4-23, 10-12-23, 10-18-23a, 10-18-23b, 11-27-23, 12-12-23, 12-13-23, 1-2-24a, 1-2-24b, 1-2-24c, 1-2-24d, 1-2-24e, 1-30-24, 2-1-24a, 2-1-24b, 2-1-24c, 2-1-24d, 2-1-24e, 2-2-24a, 2-2-24b, 2-2-24c, 2-2-24d, 2-2-24e, 2-2-24f, 2-2-24g, 2-2-24h, 2-2-24i, 2-2-24j, 2-2-24k, 2-2-24l, 2-2-24m, 2-5-24a, 2-5-24b, 2-5-24c, 2-5-24d, 2-5-24e, 2-5-24f, 2-5-24g, 2-5-24h, 2-5-24i, 2-5-24j, 2-5-24k, 2-5-24l, 2-5-24m, 2-5-24n, 2-6-24a, 2-6-24b, 2-6-24c, 2-6-24d, 2-6-24e, 2-6-24f, 2-7-24a, 2-7-24b, 2-7-24c, 2-8-24a, 2-8-24b, 2-8-24c, 2-8-24d, 2-8-24e, 2-8-24f, 2-9-24a, 2-9-24b, 2-9-24c, 2-9-24d, 2-9-24e, 2-9-24f, 2-9-24g, 2-9-24h, 2-12-24, 2-15-24, 2-16-24a, 2-16-24b, 2-16-24c, 2-16-24d, 2-16-24e, 2-16-24f, 2-16-24g, 2-16-24h, 2-16-24i, 2-20-24a, 2-20-24b, 2-20-24c, 2-20-24d, 2-20-24e, 2-20-24f, 2-20-24g, 2-20-24h, 2-20-24i, 2-20-24j, 2-20-24k, 2-20-24l, 2-21-24a, 2-21-24b, 2-21-24c, 2-21-24d, 2-21-24e, 2-21-24f, 2-22-24a, 2-22-24b, 2-22-24c, 2-22-24d, 2-22-24e, 2-23-24a, 2-23-24b, 2-23-24c, 2-23-24d, 2-23-24e, 2-23-24f, 2-24-24a, 2-24-24b, 3-25-24, 3-26-24, 5-1-24, 5-17-24, 5-24-24, 6-10-24, 6-18-24, 6-20-24, 7-17-24, 8-2-24, 8-5-24

Interviews:

Agency PREA Coordinator

- PREA Compliance Manager

Facility Administrator

- Intake Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Random Inmates
- Disabled Inmates
- Limited English Proficiency Inmates

Site Review Observations:

- Observed the inmate reception area.
- Observed PREA educational process.
- Observed that PREA informational postings in languages spoken by significant portions of the inmate population; namely English and Spanish, were continuously available in the Intake Area, Inmate Housing, Education, Library, Law Library, and other areas of high traffic.
- Observed PREA information available in large print.
- Observed PREA information within Inmate Handbooks, in both English and Spanish.
- Observed PREA pamphlet, available in both English and Spanish, which is provided to all inmates upon intake.
- Observed continuous access to PREA related materials, as well as the PREA video, on inmate tablets. This information is available in both English and Spanish.
- Observed 0850 daily announcement of PREA video in inmate housing area.
- Observed announced 0900 inmate PREA training video playing within inmate housing areas.
- Observed staff Guardian RFID, which contains a Google Translation App to communicate with inmates who do not speak English.
- Observed the Guardian RFID functionality, which allows for translation through text, conversation, photo, and handwriting to assist with in communicating with inmates with disabilities.
- Tested facility translation method, to include speaking with staff translators

and a demonstration of the Guardian RFID functionality.

- Reviewed eleven (11) inmate files for documentation of PREA training.

Standard Subsections:

(A) CCNO policies (#5002, #4101, #2100) require that upon receipt into the facility, inmates shall receive information in their native language, when possible, explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Additionally, inmates will receive information on "how to report incidents or suspicions of sexual abuse or sexual harassment" (#2100). As noted by Intake staff, inmates are immediately provided a summary of the PREA standards upon their initial arrival to the facility. Within the audit time frame, the CCNO has received 4,560 inmates during the Intake process. Of those inmates, 100% were provided the initial PREA screening and educational information.

(B) CCNO policy (#2100) requires that "within 30 days of intake, the CCNO will provide comprehensive education to inmates, either in person or through video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incident, and regarding CCNO policies and procedures for responding to such incident. As noted by Intake staff, inmates are provided a more comprehensive training detailing key points of the process following their initial intake. Specifically, as noted by the PREA Coordinator, inmates are given an "opportunity to review a comprehensive PREA pamphlet and an inmate handbook during the booking process. Also, staff makes each inmate aware that a comprehensive video orientation continually plays on Channel 20 in all units. Central also announces, daily, at 0850 that the Orientation Video will be played on Channel 20 at 0900 in all units." Following initial booking, "during the classification survey, a classification staff member will ensure that each inmate is aware of the zero-tolerance policy, they are aware of the PREA pamphlet, they are aware of the inmate handbook, and make them aware they (all educational materials) are also available on all inmate tablets." This material is available in English and Spanish. The Classification staff member will then ask inmates if they have any questions regarding the zero-tolerance policies. As well, all inmates are instructed to watch the PREA orientation video. Within the audit time frame, the CCNO has received 1,747 inmates whose length of stay was more than thirty days. Of these, 100% were provided this more comprehensive explanation of the PREA process.

(C) The CCNO is a jail facility. As the CCNO has been actively engaged in the PREA process for numerous years, all inmates currently incarcerated at this single-facility agency have received training on the facility's zero-tolerance policy for sexual abuse

and sexual harassment.

(D) CCNO policy (#2100) requires that all PREA information is provided in several alternative formats to ensure inmates with disabilities, “including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills,” have equal opportunity to receive, understand, and utilize the PREA process as necessary to promote the sexual safety of all inmates assigned to the CCNO. PREA brochures and informational posters are provided in both English and Spanish, the two most common languages spoken within the CCNO. Per Intake staff, for inmates speaking other languages, telephonic translations services are provided. The PREA video is available in two languages: English and Spanish. PREA informational posters are available in large print for the visually impaired. As well, per policy (#4108), the agency will provide reasonable accommodations to all inmates in need of ADA accommodations, both physical and cognitive, so as to ensure said inmates have equal opportunity to benefit from the PREA program.

(E) In accordance with policy (#2100, #5002), and confirmed by Intake Staff, at Intake, inmates are provided with a brief summary of the zero-tolerance policy by Intake staff. Immediately following inmates are given a more comprehensive facility orientation, to include additional PREA information. The information received is documented on the Booking Summary form, which is then acknowledged by signature by both the inmate receiving information and the staff member providing it. The agency then maintains this documentation to reflect that all inmates have been made aware of their rights under the PREA program. During inmate interviews, eleven (11) of the 31 inmates provided the opportunity to interview stated that they had not received, or did not remember receiving, PREA training. Accordingly, their files were reviewed. At that time, it was noted that all eleven (11) had, in fact, received PREA training, as well as signed documentation acknowledging this training.

(F) As noted by the PREA Compliance Manager, in addition to receiving information on the agency PREA policy during facility intake, inmates assigned to the CCNO also have key information from the agency PREA program continuously available to them via the orientation video, tablets, posters, handbooks, and other written formats. Specifically, while inmates are provided personal copies of the CCNO Inmate Orientation Handbook (available in English and Spanish) upon receipt into the CCNO system, this information, as well as a wealth of other PREA related information, is also continuous available on their inmate tablets. Additionally, throughout the facility, as well as posted near all inmate phones, PREA informational posters are displayed in both English and Spanish. The comprehensive video orientation is continuously available on inmate tablets, as well as announced and played daily in all housing units. As well, in excess of the PREA Standards, via the use of personal language translation devices provided to all correctional staff assigned to inmate housing areas,

all inmates, regardless of language barriers that might otherwise exist, can have fluent conversations with staff specific to any concerns they may have regarding the agency's zero-tolerance policy or their sexual safety while incarcerated.

Reasoning & Findings Statement:

This standard works to ensure that inmates are cognizant of the agency's zero-tolerance policy toward sexual abuse and sexual harassment, as well as have subsequent access to, and can effectively utilize, the PREA reporting mechanism. In providing education specific to the agency's zero-tolerance program, inmates are given opportunity to review a comprehensive PREA pamphlet and an inmate handbook during the booking process. Staff speak with each inmate to ask inmates if they understand the zero-tolerance policy and if they have any questions regarding it. Staff also make each inmate aware that a comprehensive video orientation continually plays on Channel 20 in all units. Central Control makes a daily announcement at 0850 each morning that the Orientation Video will be played on Channel 20 at 0900 in all inmate housing units. During the classification survey following their initial booking, a classification staff member will ensure that each inmate is aware of the zero-tolerance policy and that they were given the PREA pamphlet and an inmate handbook. Classification staff again advise all inmates that all of the sexual abuse awareness information also available on all inmate tablets in both English and Spanish. In speaking with inmates assigned to the CCNO, all inmates stated that they were aware of PREA and its purpose within the facility. While inmates were collectively aware of the policy and their rights to varying degrees, all inmates interviewed were specifically aware of at least one, but generally more, methods by which they could report allegations of sexual abuse or sexual harassment. Accordingly, the CCNO has exceeded compliance with the standards related to this provision.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #6101, Staff Training - Full Service Jail, 2-15-23 · CCNO Investigator Training Record: 4-18-24a, 4-18-24b

- CCNO NIC, Communicating Effectively and Professionally with LGBTI Offenders, 5-11-23
- CCNO NIC, PREA: Your Role in Responding to Sexual Abuse: 3-2-21, 5-10-23
- CCNO Public Agency Training Counsel, Investigator Certification, 2-7-24
- CCNO NIC, PREA: Investigating Sexual Abuse in a Confinement Setting, 3-17-21
- CCNO NIC, PREA: Investigating Sexual Abuse in a Confinement Setting, Advanced Investigations, 4-14-21
- CCNO Human Resources Training Record, 4-18-24
- CCNO Bureau of Adult Detention, Prison Rape Elimination Training, 5-25-07
- CCNO Ohio Peace Officer Training Commission, Sexual Harassment and Abuse in Corrections Instructor, 11-5-08
- CCNO PREA Update Training, 11-2-10
- CCNO Training Force, Prison Rape and Sex Assault Investigations Inside Correctional Facilities, 5-12-14

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Administrative (Human Resources) Staff
- Administrative Investigative Staff
- Criminal Investigative Staff

Site Review Observations:

- Observed investigative training certifications.
- Reviewed agency training records documenting investigative trainings.

Standard Subsections:

(A) Per policy (#5002, #6101), all investigators must receive specialized training in excess of the generalized sexual abuse and sexual harassment training provided to other staff. Among other classes, investigators must participate in training that includes “conducting such investigations in a confinement setting” (#6101). In interviewing CCNO investigative staff, said staff confirmed participation in numerous related courses. Additionally, training documents and employee training certifications provided additional documentation to support facility compliance.

(B) Per policy (#6101), all investigators must receive specialized training that includes, but not limited to, “interviewing techniques for sexual abuse victims, proper use of Garrity warnings, sexual abuse evidence collection in a confinement setting, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.” In interviewing CCNO investigative staff, said staff confirmed participation in numerous related courses. Additionally, employee training records, as well as certifications, provide additional documentation to support facility compliance.

(C) CCNO Policy (#6101) requires that “copies of all training certificates will be maintained in the individual employee file.” Accordingly, per Human Resource staff, the agency does maintain documentation that agency investigators have completed the required specialized training related to sexual abuse investigations. A review of training certifications confirms that such documentation is maintained within agency files for all investigators currently utilized within the CCNO.

(D) The auditor is not required to audit this provision.

Reasoning & Findings Statement:

This standard works to ensure that persons investigating allegations of sexual abuse and sexual harassment have been sufficiently trained in related procedural and due process requirements necessary for both administrative prison hearings and for federal or state judiciary proceedings. The CCNO investigative staff are required to attend both general PREA training, as well as PREA trainings specific to conducting investigations of sexual victimization in a confinement setting. CCNO investigative staff affirmed receipt of sufficient training necessary to confidently conduct sexual abuse investigations in a confinement setting. As well, documentation verified that CCNO staff do receive specialized training in excess of the generalized training

provided to all staff. As such, the CCNO meets the requirements of this standard.

115.35 Specialized training: Medical and mental health care

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #6101, Staff Training - Full Service Jail, 2-15-23
- CCNO Pre-Service Lesson Plan, 5-3-18
- CCNO Memo, Medical and Mental Health Training, 5-8-24
- CCNO Memo, Forensic Exams, 3-26-24
- CCNO Event Training for Contract Staff, 2023
- CCNO Pre-Service Training Program: 5-15-23, 12-4-23
- CCNO Acknowledgment Form: 5-16-23, 12-7-23
- CCNO PREA & Staff Sexual Misconduct Post-Test: 5-16-23, 12-8-23
- CCNO Contract Staff Agreement, 11-3-23
- CCNO Monthly Self Training Signature Sheet, 8-20-23
- CCNO Southern Health Partners, Medical Staff Training Record, 8-18-23
- CCNO Southern Health Partners, Orientation Checklist for New Employees, nd
- CCNO Vital Core, Orientation, nd
- CCNO Licensed Social Worker, 5-31-22
- CCNO Ohio Professional License: 5-31-22, 12-6-22, 6-27-23

Interviews:

- Agency PREA Coordinator

- PREA Compliance Manager
- Facility Administrator
- Administrative (Human Resources) Staff
- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel Parkview Bryan Hospital

Site Review Observations:

- Review of facility training records

Standard Subsections:

(A) The CCNO provides medical and mental health services to inmates assigned to its facility. Policy (#6101) requires that in addition to the generalized training provided to all staff, “all full-time 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; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.” There are 22 medical and mental health care practitioners who regularly work at the CCNO, with 100% having received training on the agency’s PREA policies. Interviews with CCNO medical/mental health staff, as well as with SAFE/SANE nursing personnel of the Parkview Bryan Hospital, all confirm that said persons have received trainings as required. A review of CCNO training records document medical and mental health care practitioners’ participation in initial and/or continuing training requirements.

(B) In accordance agency policy and verified through interviews with CCNO medical/mental health staff, medical staff at CCNO do not conduct forensic medical examinations. Rather, as confirmed by community-based SAFE/SANE personnel, inmates are transported to a nearby public SART Clinic or a local medical facility, Parkview Bryan Hospital, or for such services.

(C) A review of training records reflects that 100% of the 22 Medical and Mental

Health employees assigned to the CCNO, have received specialized training appropriate for their professional roles.

(D) As well, in accordance with their professional role, a review of training records reflects medical and mental health practitioners have also received the generalize PREA training provided to all other persons working within a correctional setting.

Reasoning & Findings Statement:

This standard works to ensure that medical and mental health staff have received specialized training for medical and mental health services provided to victims of sexual abuse and sexual harassment. The CCNO has policies in place to ensure all CCNO medical and mental health staff are furnished this training. CCNO medical and mental health administration confirmed that said staff have received all required and continuing education classes specific to their professional role as it applies to medical and mental health services administered when assisting victims of sexual abuse and sexual harassment. Also, SAFE/SANE personnel of the Parkview Bryan Hospital and SART Clinic confirm that all persons conducting forensic medical exams are properly certified to perform said exams. Documentation of agency training verifies that medical and mental health receive not only the generalized PREA training provided to all staff, but also specialized training specific to their medical and mental health roles within the agency. As such, the CCNO meets the requirements of this standard.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents: <ul style="list-style-type: none">· CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21· CCNO #4300, Medical/Mental Health Care Services for Inmates, 10-31-22· CCNO #4101, Classification of Inmates, 3-2-23· CCNO Southern Health Partners, Medical Staff Receiving Screening Form· CCNO Southern Health Partners, Suicide Prevention Screening Guidelines Form

- CCNO Attachment #4300-A, PREA Survey
- CCNO Southern Health Partners, Patient's Consent for Treatment, 11/2015
- CCNO Ohio Department of Medicaid, Appendix C
- CCNO Vital Core, Medical and Behavioral Health Admission Care Screen, 2-20-22
- CCNO Vital Core, Pre-Admission Health Care Screen, 6-9-22
- CCNO Vital Core, PREA Survey
- CCNO Vital Core, General Informed Consent Admission
- CCNO Vital Core, Pre-Admission Health Care Screen: 2-23-24
- CCNO Vital Core, Medical and Behavioral Health Admission Care Screen: 12-1-23, 12-12-23, 2-23-24
- CCNO Vital Core, General Informed Consent: 2-23-24
- CCNO Vital Core, Initial Health Assessment: 11-8-23,
- CCNO Correctional Behavioral Health Assessment: 12-26-23
- CCNO Vital Core, Initial PREA Surveys and Reassessments: 11-7-22, 11-16-22, 1-7-23, 7-19-23, 7-31-23, 8-24-23, 9-28-23, 10-12-23, 10-27-23, 10-31-23, 1-2-24, 1-4-24, 1-27-24, 2-1-24, 2-2-24a, 2-2-24b, 2-2-24c, 2-2-24d, 2-5-24, 2-6-24a, 2-6-24b, 2-9-24, 2-11-24a, 2-11-24b, 2-14-24a, 2-14-24b, 2-16-24a, 2-16-24b, 2-17-24a, 2-17-24b, 2-17-24c, 2-17-24d, 2-17-24e, 2-17-24f, 2-20-24a, 2-20-24b, 2-20-24c, 2-20-24d, 2-22-24a, 2-22-4b, 2-21-24, 2-22-24b, 2-22-24c, 2-22-24d, 2-23-24a, 2-23-24b, 2-23-24c, 2-26-24a, 2-26-24b, 2-27-24a, 2-27-24b, 2-27-24c, 2-28-24a, 2-28-24b, 2-28-24c, 2-28-24d, 2-28-24e, 2-28-24f, 2-29-24a, 2-29-24b, 2-29-24c, 2-29-24d, 2-29-24e, 2-29-24f, 3-1-24, 3-2-24, 3-3-24, 3-4-24a, 3-4-24b, 3-4-24c, 3-5-24a, 3-5-24b, 3-5-24c, 3-5-24d, 3-5-24e, 3-5-24f, 3-5-24g, 3-6-24a, 3-6-24b, 3-6-24c, 3-6-24d, 3-6-24e, 3-7-24, 3-8-34a, 3-8-34b, 3-10-24a, 3-10-24b, 3-11-24a, 3-11-24b, 3-11-24c, 3-11-24d, 3-12-24a, 3-12-24b, 3-13-24a, 3-13-24b, 3-13-24c, 3-13-24d, 3-13-24e, 3-13-24f, 3-14-24a, 3-14-24b, 3-14-24c, 3-14-24d, 3-14-24e, 3-15-24a, 3-15-24b, 3-15-24c, 3-15-24d, 3-15-24e, 3-15-24f, 3-18-24a, 3-18-24b, 3-18-24c, 3-19-24a, 3-19-24b, 3-19-24c, 3-19-24d, 3-19-24e, 3-20-24a, 3-20-24b, 3-20-24c, 3-20-24d, 3-20-24e, 3-22-24a, 3-22-24b, 3-25-24a, 3-25-24b, 3-25-24c, 3-25-24d, 3-26-24a, 3-26-24b, 3-26-24c, 3-26-24d, 3-26-24e, 3-27-24a, 3-27-24b, 3-27-24c, 3-27-24d, 3-27-24e, 3-28-24a, 3-28-24b, 3-28-24c, 3-29-24a, 3-29-24b, 3-29-24, 4-1-24a, 4-1-24b, 4-1-24c, 4-2-24a, 4-2-24b, 4-2-24c, 4-3-24a, 4-3-24b, 4-4-24a, 4-4-24b, 4-4-24c, 4-4-24d, 4-4-24e, 4-4-24f, 4-5-24a, 4-5-24b, 4-6-24, 4-8-24a, 4-8-24b, 4-8-24c, 4-9-24a, 4-9-24b, 4-9-24c, 4-10-24, 4-12-24a, 4-12-24b, 4-12-24c, 4-12-24d, 4-12-24e, 4-16-24a, 4-16-24b, 4-16-24c, 4-16-24d, 4-18-24a, 4-18-24b, 4-19-24a, 4-19-24b, 4-22-24a, 4-22-24b, 4-23-24a, 4-23-24b, 4-23-24c, 4-25-24, 4-27-24c, 4-29-24a, 4-29-24b, 4-29-24c, 4-29-24d, 4-30-24, 5-1-24a,

5-1-24b, 5-2-24a, 5-2-24b, 5-6-24a, 5-6-24b, 5-6-24c, 5-7-24a, 5-7-24b, 5-7-24c, 5-7-24d, 5-7-24e, 5-8-24a, 5-8-24b, 5-8-24c, 5-10-24, 5-11-24a, 5-11-24b, 5-11-24c, 5-13-24, 5-14-24a, 5-14-24b, 5-15-24a, 5-15-24b, 5-15-24b, 5-17-24, 5-19-24a, 5-19-24b, 5-21-24a, 5-21-24b, 5-21-24c, 5-24-24a, 5-24-24b, 5-24-24c, 5-29-24, 5-31-24, 6-4-24, 6-5-24a, 6-5-24b

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intake Staff
- Medical Staff
- Mental Health Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Random Inmates
- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex
- Inmates Who Reported Sexual Abuse
- Limited English Proficient Inmates
- Disabled Inmates

Site Review Observations:

- Observed PREA screening process.
- Observed housing formats and locations.
- Reviewed initial PREA assessments and subsequent assessments.

Standard Subsections:

(A) Policy (#4300) requires that “all inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.” The CCNO Intake and Medical staff affirm the facility’s adherence to agency policy. Specifically, all inmates received into the facility are initially screened for sexual victimization and/or sexually abusive risk factors on the same day that they arrive. The Intake, as well as the series of risk screening processes, were observed by the auditor.

(B) As noted within policy (#4300), “the formal classification process that starts at booking is used for managing and separating inmates, and administering the facility classification system based upon the agency mission, classification instrument, and inmate custody and program needs. The process uses verifiable and documented data about inmates. The classification system is used to separate inmates into groups that reduce the probability of escape, assault, and disruptive behavior. At a minimum, the classification system evaluates the followings: mental and emotional stability; escape history; history of assaultive behavior; medical status; age; need to keep separate; and past/present institutional behavior problems.” As such, policy (#4300) requires that the “intake screening shall ordinarily take place within 24 hours of arrival at the facility.” In speaking with CCNO Intake and Medical staff, as well as the CCNO PREA Compliance Manager, it was noted that said screenings generally take place immediately upon each inmate’s arrival to the facility. Within the audit time frame, the CCNO has received 4,560 inmates during the Intake process. Of those, 3,670 inmates had stays at the facility for 72 hours or more, with 100% of them being provided their initial PREA screening and educational information within 72 hours of being incarcerated.

(C) Policy (#4300) requires that “such assessments shall be conducted using an objective screening instrument.” A review of the forms used for assessment purposes do not present with either an implicit bias or leading statements. The following forms are used by medical staff when conducting risk assessments in order to gather a collective account of the individual being incarcerated: the Medical Staff Receiving Screening Form, Suicide Prevention Screening Guidelines Form, the PREA Survey Form, the Patient’s Consent for Treatment Form, the Ohio Department of Medicaid Appendix C, Vital Core Medical & Behavioral Health Admission Care Screen, a second PREA Survey Form (completed by a second screener), Vital Core Pre-Admission Health Care Screen, and a General Informed Consent Admission Form. To determine an inmate’s risk of sexual victimization or abusiveness, as well as to identify other risk factors inherent to jail settings, upon incarceration, every inmate is subject to multiple screenings by different persons acting in different roles. As further stressed by the Medical/Mental Health staff, quite often when a person comes to jail for the first time, or if the charges against that person are particularly unsettling, that individual may not feel comfortable answering questions, may be intimidated by certain staff, or not connect well with staff serving in a particular role. Accordingly, multiple staff are used to collect data specific to sexual abuse and sexual harassment

risk factors, as well as other known risks to persons recently placed in a confinement setting. Through this series of screenings, which are all conducted in private settings, inmates are asked risk factor questions that do not contain value statements, bias language, or implied negative consequences for affirmative answers to any of the questions asked. Instead, as observed by the auditor, the screening surveys are used strictly as utilitarian forms administered in a nonjudgmental manner during screening observations. Lastly, as noted on individual assessment forms, predetermined actions are objectively required when inmate answers either necessitate immediately required responses by policy or the cumulative value of scored responses suggest that heightened monitoring, speaking with mental health staff, or additional assessments would better serve the inmates' wellbeing. As stated by the PREA Coordinator, the purpose of this multi-faceted screening approach is to encourage the greatest measure of open communication with inmates in order to collect relevant data about the person in custody. The CCNO then uses this information "to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive" (#4300).

(D) As noted within policy (#4300), "inmate management and housing assignment are based on age, gender, legal status, custody needs, special problems and needs, and behavior." As such, through the series of forms noted above, the PREA assessment process does consider, at a minimum, if the inmate has a mental, physical, or developmental disability. It considers the age of the inmate, the inmate's physical build, whether the inmate has previously been incarcerated, whether the inmate's criminal history is exclusively nonviolent, whether the inmate has prior convictions for sex offenses against an adult or child, whether the inmate has previously experienced sexual victimization, the inmate's own perception of vulnerability, and whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming. Inmates are explicitly asked if they are gay, lesbian, bisexual, transgender, intersex, or gender nonconforming/gender nonbinary. Inmates are then asked if others perceive them as the same. It should also be noted that if an inmate affirmatively responds to any of the known risk factors for sexual victimization or sexual abusiveness, that person is automatically issued a general referral to mental health for further risk assessments to be conducted within 14 days to promote the safety and wellbeing of individual inmates, as well as the inmate population as a whole. If an inmate responds that he/she has experienced sexual victimization while incarcerated, there is an immediate referral to mental health and the Executive Director of the CCNO must also be notified within 24 hours. During inmate interviews, twelve (12) inmates stated that they had not been asked any risk assessment questions upon entry. However, a review of records reflects that all twelve (12) inmates had, in fact, been asked the aforementioned questions upon their receipt into the CCNO, as well as during subsequent risk assessments where appropriate.

(E) In assessing inmates for their risk of being sexually abusive, the PREA assessment forms do consider prior acts of sexual abuse, prior convictions for violent offenses, and the history of prior institutional violence or sexual abuse. Along with observing the screening process, the auditor also reviewed numerous PREA assessment forms completed within the auditing time frame. All forms were generally filled out in their entirety, with inmates having generally provided relevant answers to each of the questions asked. It should further be noted that Intake and Medical staff both confirmed that inmates may refuse to answer any question on the survey or may refuse participation in the entire survey process without the threat of negative consequences.

(F) Policy (#4101) requires that “within a set time period, not to exceed 30 days from the inmate’s arrival at the CCNO, medical staff will reassess at the fourteen-day physical the inmate’s risk of victimization or abusiveness based upon any additional, relevant information received by the CCNO since the intake screening.” Within the audit time frame, 100% of the 1,747 inmates with a length of stay in the facility for 30 days or more, were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival to the CCNO. In speaking with CCNO risk assessment staff, their adherence to this policy was confirmed. Additionally, a review of documentation specific to said assessments confirmed both initial and subsequent assessments were provided within the required time frames.

(G) Policy (#4101) allows that “an inmate’s risk level will be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness.” Both the CCNO PREA Compliance Manager and staff who perform screenings for risk of victimization and abusiveness confirm reassessments are conducted as required. As well, in discussing reassessment processes with inmates, a few inmates stated that after having brought any type of concern to the attention of security personnel, they were subsequently interviewed by unit management staff regarding these concerns. Accordingly, most of these inmates believed that CCNO staff did address their needs in a timely manner. When asked, all of these inmates, as well as all other inmates interviewed, stated that they felt their sexual safety was not at risk at CCNO.

(H) Policy (#4101) expressly prohibits disciplinary sanctions against any inmate who refuses to answer or fails to provide complete and/or accurate answers to any of the questions noted on any of the assessment forms. When interviewed, Intake, Medical, and the CCNO PREA Compliance Manager affirmed that disciplinary sanctions were not imposed against inmates for refusing or failing to answer any of the questions on the PREA assessment forms. As well, inmate interviews confirmed that said population was aware of their right not to answer related questions.

(I) Policy (#4101) requires that “appropriate controls are in place for the dissemination within the CCNO of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate’s detriment by staff or other inmates.” Accordingly, facility staff must restrict the spread of information obtained as a function of the risk screening assessment forms to only those designated staff members with an operational need for said information in order to inform classification, housing and work assignments, programmatic and non-programmatic activities, or other relevant institutional activities. The PREA Compliance Manager, Medical/Mental Health Staff, Intake, Classification, and other operative staff associated with the PREA assessment process affirmed the information obtained by way of said documents was considered restricted, and as such, was not distributed to unauthorized staff. Lastly, the auditor observed that completed PREA Assessment Forms did require authorized credentials to access electronic documents within the CCNO computer data base, as well as to review the any physical copies of said documents.

Reasoning & Findings Statement:

This standard works to ensure inmates are properly screened for their risks of sexual victimization and abusiveness. Agency policy provides for an objective risk assessment process, which is administered and scored at the facility level as a simple fact assessment. To determine an inmate’s risk of sexual victimization or abusiveness, as well as to identify other risk factors inherent to jail settings, upon incarceration, every inmate is subject to multiple screenings by different persons acting in different roles. As noted by the PREA Coordinator, the purpose of this multi-faceted screening approach is to encourage the greatest measure of open communication with inmates. As further stressed by the Health Services Administrator, quite often if a person is coming to jail for the first time, or if the charges against that person are particularly unsettling, that inmate may not feel comfortable answering questions or may be intimidated by certain staff or staff serving in a particular role. Accordingly, multiple staff are used to collect data specific to sexual abuse and sexual harassment risk factors, as well as other factors that may contribute to other known risks to persons recently incarcerated in a confinement setting. Through this series of screenings, inmates are asked questions that do not contain value statements, bias language, or implied negative consequences for affirmative answers to any of the questions asked. It should also be noted that if an inmate responds affirmatively to any of the specific PREA Survey questions, that person is automatically issued a general referral to mental health for further risk assessments to be conducted within 14 days. If an inmate responds that he/she has experienced sexual victimization while incarcerated, not only is there an immediate referral to mental health, but the Executive Director of the CCNO must also be notified within 24 hours. Inmates are reassessed as required by policy, to include if new information is discovered by facility staff that might warrant changes in inmates’ risk status. Interviews with risk screening staff, as well

	<p>as with inmates, confirm that the proper screening tools are being utilized at the CCNO. As well, the information gleaned from these forms is appropriately used to inform classification, housing, work, and other facility-based activities. Staff charged with administering risk assessment forms affirm the restricted nature of the information and their adherence to the facility's limited distribution list. As such, the CCNO has satisfied the requirements of this standard and is found to meet its expectations.</p>
--	--

115.42	Use of screening information
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #4300, Medical/Mental Health Care Services for Inmates, 10-31-22 · CCNO #4101, Classification of Inmates, 3-2-23 · CCNO Medical & Behavioral Health Admission Care Screen: 2-21-24 · CCNO PREA Survey, 2-21-24 · CCNO General Informed Consent, 2-21-24 · CCNO Intake Screening, 2-21-24 · CCNO Jail Unit Profile, 2-22-24 · CCNO Medical & Behavioral Health Admission Care Screen, 1-31-24 · CCNO General Informed Consent Admission, 1-31-24 · CCNO PREA Survey, 1-31-24 · CCNO Intake Screening, 1-31-24 · CCNO Jail Unit Profile, 1-31-24 · CCNO Memo, Transgender/Intersex Housing, 3-26-24 <p>Interviews:</p>

- Agency PREA Coordinator

PREA Compliance Manager

Facility Administrator

- Intermediate or Higher-Level Facility Staff

- Intake Staff

- Medical Staff

- Mental Health Staff

- Staff Who Perform Screening for Risk of Victimization and Abusiveness

- Random Staff

- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex

- Disabled Inmates

- Limited English Proficient Inmates

Site Review Observations:

- Observed PREA screening process.

- Observed inmate housing and work assignments.

- Reviewed inmate files.

Standard Subsections:

(A) Policy (#4101) requires that the agency use information from the PREA risk assessment forms to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. As such, the information gleaned from the PREA assessment form is, in fact, used to inform inmate housing, work, and programming assignments. In speaking with Intake and Medical staff, as well as the CCNO PREA Compliance Manager, once an inmate is deemed as a possible risk for sexual victimization, staff will ensure that person at risk is not housed in a vulnerable location, especially in respect to other inmates who are assessed at a risk to sexually abuse other inmates. Facility documentation reflects this is an institutionalized process.

(B) Policy (#4101) requires that the facility makes individualized determinations on how to ensure the safety of each inmate. In speaking with the PREA Coordinator, the CCNO PREA Compliance Manager, and the CCNO Warden, staff affirmed that the concerns for every inmate are reviewed on an individual basis. In speaking with inmates currently assigned to the CCNO, most stated that their own opinions regarding their personal safety are considered by CCNO staff when provided housing or job assignments. Inmates further stated that if their concerns for their own safety changed, they believed CCNO staff would take their concerns seriously. As such, there weren't any (0) inmates who expressed any fear or concern for their sexual safety while assigned to CCNO.

(C) "In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the CCNO will consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems" (#4101). In speaking with the PREA Coordinator, the CCNO PREA Compliance Manager, and the CCNO Executive Director, staff affirmed that an inmate's genital status is not the sole determining factor in placing transgender or intersex inmates in male or female facilities, or in placing said inmates within specific housing or program assignments within a facility.

(D) Agency policy (#4101) requires that the placement and programming assignments of transgender or intersex inmates are reviewed at least twice every year to review any threats to safety experienced by inmates. When interviewed, CCNO risk assessment staff did affirm the facility's compliance with this policy. As well, along with routine informal safety checks by the CCNO PREA Compliance Manager and random staff, the one (1) intersex inmate currently confined within CCNO confirmed that while their living or other environmental concerns for their sexual safety had been formally reviewed by agency official upon incarceration, no other risk assessments had been conducted. However, documentation review of said inmate reflects that an initial risk assessment, with subsequent mental health referral, was provided to this inmate upon incarceration. A general reassessment was then provided within policy guidelines. Additionally, health services have performed at least one (1) additional risk screening on this inmate since incarceration.

(E) Agency policy (#4101) requires that upon the routine review of the placement and programming assignments of transgender or intersex inmates, the transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. When interviewed, CCNO staff and the CCNO PREA Compliance Manager affirmed that the facility strictly adherences to this policy. Additionally, during random and targeted interviews with inmates, most stated that they believed CCNO staff would consider inmates' own views with respect to their own safety. The one (1) intersex inmate currently assigned to CCNO also stated that staff had asked

this individual questions about their own safety and believed staff would consider their own views with respect to their own safety.

(F) Policy (#4101) allows for transgender and intersex inmates to be given the opportunity to shower separately from other inmates. In interviewing transgender inmates, all such inmates were aware of their right to shower separately from the general inmate population. All showers do contain PREA privacy screens. The one (1) intersex inmate currently assigned to CCNO stated that this individual was allowed to shower separately from other inmates.

(G) The CCNO is not subject to consent decrees, legal settlements, or legal judgments requiring it to establish a dedicated housing unit for lesbian, gay, bisexual, transgender, or intersex inmates. As such, policy (#4101) notes that LGBTI inmates shall not be placed in dedicated housing units on the basis of such identification. In speaking with the PREA Coordinator, the CCNO PREA Compliance Manager, and the CCNO Warden, staff adamantly affirm that inmates who identify as transgender or intersex are not placed in a housing assignment based solely on their sexual or gender identity. During interviews of intersex, gay, and bisexual inmates, none stated that they had ever been housed in a specific housing assignment within the CCNO based solely on their gender identity or sexual orientation. As well, of the random staff interviewed, all staff affirmed that the CCNO does not house transgender, intersex, gay, or bisexual inmates in any specific areas based solely on their gender identity or sexual orientation.

Reasoning & Findings Statement:

This standard works to ensure the adequate use of screening information to promote and protect inmates who may be at high risk of being sexually victimized. The CCNO has policies in place to ensure the most effective and secure use of the PREA assessment forms. Inmates deemed to be at high risk are routinely monitored by the CCNO PREA Compliance Manager, as well as unit staff, to ensure their sexual safety. Agency policies require staff to make individualized determinations on a case-by-case basis regarding inmate safety. Interviews with the CCNO PREA Coordinator and the CCNO PREA Compliance Manager reflect that facility staff have discretion in managing the safety of individual inmates. The CCNO PREA Compliance Manager, as well as all other CCNO staff, affirm their adherence to agency policies and also confirm that the inmate's own views regarding the inmate's own safety are given serious consideration specific to facility operations. Transgender and intersex inmates are allowed to shower separately from the general population. Additionally, transgender inmates are reviewed at least every six months specific to their placement and programming assignments. As such, agency policy meets, and CCNO adheres to, the requirements of this standard.

115.43 Protective Custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #4103, Segregation Housing, 5-8-23
- CCNO Memo, No Involuntary Segregated Housing, 3-26-24

Interviews:

- Agency PREA Coordinator

PREA Compliance Manager

Facility Administrator

- Intermediate or Higher-Level Facility Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Staff Who Supervise Inmates in Segregated Housing
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Observed custody housing assignments.

Standard Subsections:

(A) Policy (#4103) mandates that agency staff shall 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. If the CCNO cannot conduct such an assessment immediately, the CCNO may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.” In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirm that there have not been any (0) inmates placed in involuntary segregated housing for risk of sexual victimization during the audit time frame. As well, inmate interviews did not suggest that CCNO utilizes any form of restrictive housing as a primary means of separation for investigatory purposes for risk of sexual victimization. As such, there wasn’t any relevant documentation to review.

(B) Policy (#4103) allows that “inmates placed in segregated housing for the purpose of protective custody shall have access to programs, privileges, education, and work opportunities to the extent possible.” If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document this restriction. In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirm that there have not been any (0) inmates placed in the involuntary segregated housing for risk of sexual safety during the audit time frame. Additionally, no inmates stated that they had been placed in such housing. As such, there wasn’t any relevant documentation to review.

(C) Policy (#4103) mandates that involuntary segregated housing for inmates at a high risk of sexual victimization shall only be used until an alternative means of separation from likely abusers can be arranged, but no more than 24 hours without an assessment of all available alternatives has been completed. Policy (#4103) further requires that the assignment shall not ordinarily exceed a period of 30 days. In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirmed that there have not been any (0) inmates placed in the involuntary segregated housing for risk of sexual safety during the audit time frame. Additionally, no inmates stated that they had been placed in such housing. As such, there wasn’t any relevant documentation to review.

(D) Policy (#4103) requires that upon placement of an inmate into the involuntary segregated housing, the facility must clearly document the basis of the facility’s concern for the inmate’s safety. Additionally, the facility must document whether a determination has been made that there is no available alternative means of separation from the likely abusers, including documentation of what alternatives were considered and assessed to be unavailable. In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirmed that there have not been any (0) inmates placed in involuntary segregated housing for risk of sexual safety during the audit time frame. Additionally, no inmates stated that they had been placed in such housing. As such, there wasn’t any relevant documentation to review.

(E) Policy (#4103) requires that an inmate placed in involuntary segregated housing due to being a high risk of sexual victimization shall have this status reviewed every thirty (30) days to determine whether there is a continuing need for separation from the general population. In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirmed both their knowledge of this policy and the fact that there have not been any (0) inmates placed in involuntary segregated housing for risk of sexual safety during the audit time frame. Additionally, no inmates stated that they had been placed in such housing. As such, there wasn't any relevant documentation to review.

Reasoning & Findings Statement:

This standard works to ensure that the use of involuntary segregated housing is not a de facto management solution for inmate safety concerns. Agency policy explicitly mandates that staff 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 there are no other available means of separation from likely abusers. In speaking with the CCNO PREA Compliance Manager and the CCNO Warden, staff confirmed that there have not been any (0) inmates placed in the involuntary segregated housing for risk of sexual safety during the audit time frame. Additionally, no inmates stated that they had been placed in such housing. As such, there wasn't any relevant documentation to review. Correctional staff routinely assigned to work within Segregated Housing were interviewed. While these staff confirmed that inmates assigned to involuntary segregated housing for high risk of sexual victimization would be afforded similar activities as inmates within general population, to the best of their knowledge, there have not been any such inmates assigned to such housing within the audit time frame. In total, the CCNO has satisfied all component parts of this standard and found to have met its provisions.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO PREA Orientation Video

- CCNO Zero Tolerance Poster, English
- CCNO Zero Tolerance Poster, Spanish
- CCNO Zero Tolerance Poster, Right to Report, English
- CCNO Zero Tolerance Poster, Right to Report, Spanish
- CCNO PREA, Prevent, Detect, & Respond Poster, English
- CCNO PREA, Prevent, Detect, & Respond Poster, Spanish
- CCNO PREA, Report Sexual Assault Poster, English
- CCNO PREA, Report Sexual Assault Poster, Spanish
- CCNO Inmate Rules of Conduct and Handbook, English, 2023
- CCNO Inmate Rules of Conduct and Handbook, Spanish, 2021
- CCNO PREA Pamphlet, English, 10-12-18
- CCNO PREA Pamphlet, Spanish, 10-12-18
- CCNO PREA Hotline Reporting Sign
- CCNO MOU Northwest Ohio Juvenile Detention Center (NWOJDC), 2-18-21
- CCNO MOU Northwest Ohio Juvenile Detention Center (NWOJDC), 3-11-24
- CCNO Incident Report, 10-5-23
- CCNO Pre-Service Lesson Plan, 5-3-18
- CCNO Website Information

Interviews:

- Agency Head
 - Agency PREA Coordinator
- PREA Compliance Manager
Facility Administrator
- Intermediate or Higher-Level Facility Staff
 - Random Staff
 - Just Detention International

- The Center for Child and Family Advocacy
- Williams County Victim Assistance
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed documentation related to inmate reports of sexual abuse and sexual harassment.
- Observed PREA Risk Screening assessments.
- Observed PREA Risk Screening process.
- Observed informational posters throughout the facility advising inmates of various reporting mechanisms for allegations of sexual abuse and sexual harassment.
- Observed numerous PREA educational and reporting references available for inmate use within the facility Law Library.
- Observed inmate general visitation and legal visitation informational posters.
- Observed visitation area designated for members of an approved victim advocate service.
- Observed PREA reporting information available on inmate tablets, in English and Spanish.
- Observed PREA informational video.
- Tested PREA Hotline number inmates can use to engage inmate reporting.

Standard Subsections:

(A) The agency provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, as well as neglect or violations of staff responsibilities that may have contributed to such incidents. Additionally, the agency provides numerous avenues by which inmates may report any subsequent retaliatory measures experienced by inmates as a result of having reported said abuse. Upon receipt onto the facility, all inmates are provided a PREA risk screening, via PREA assessment forms, and advised of their right to be free of sexual abuse and sexual harassment under the PREA standards. Inmates are subsequently given a more

comprehensive inmate orientation, which includes information on PREA and accessing multiple reporting methods. This training includes information on, and contact information for, internal and external reporting agencies. Inmates are also provided with an CCNO Inmate Handbook, which contains contact information for internal and external reporting agencies and victim services organizations. In interviewing staff, all employees were aware of an inmate's right to report allegations of sexual abuse and sexual harassment and to be free from measures of retaliation for having reported said abuse. In interviewing inmates, all inmates were equally aware of their right to report allegations of sexual abuse and sexual harassment and to be free from measures of retaliation for having reported said abuse. During random and targeted interviews, all inmates were able to articulate at least one manner by which a report could be made, with the majority of inmates being able to provide multiple reporting methods.

(B) As noted in policy (#5002), the facility also provides multiple avenues and contact information for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency. Inmates are provided the phone numbers to CCNO Reporting Hotline, with calls to this hotline being anonymous and without cost to the inmate. Inmates are provided the address to the primary reporting entity, the Northwest Ohio Juvenile Detention Center, which can receive and immediately forward inmate reports to agency officials for their investigation. Upon an inmate's request, the Northwest Ohio Juvenile Detention Center will allow an inmate to remain anonymous. Per the agency PREA coordinator, the CCNO does not detain inmates solely for civil immigration purposes. Nonetheless, information on how to contact relevant consular officials, as well as the Department of Homeland Security, is available in the CCNO facility Law Library and on each inmate's assigned tablet.

(C) Per policy (#5002), staff accept all reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. All employees interviewed stated that they would act on any report of sexual abuse or sexual harassment regardless of the manner by which they became aware of that information. In doing so, staff stated they would document the information as soon as possible following the allegations being presented to them. All inmates interviewed affirmed their right to make either verbal or written reports of sexual abuse and sexual harassment. Most inmates were also aware that they could make reports of sexual abuse and sexual harassment via third party or anonymously. The overwhelming majority of inmates interviewed stated that they believed CCNO staff would take any complaint of sexual safety seriously and act accordingly to address their concerns.

(D) Per policy (#5002), staff have an affirmative duty to report any knowledge, suspicion, or information they may have regarding sexual abuse, sexual harassment,

or retaliation against inmates or staff for having reported such abuse. Nonetheless, policy (#5002), also always staff to privately report sexual misconduct through the agency website. When asked, staff were generally aware that they could make anonymous reports of sexual abuse and sexual harassment.

Reasoning & Findings Statement:

This standard works to ensure inmates, staff, and outside agents have the ability to report all instances of sexual abuse and sexual harassment against inmates. The agency does have multiple avenues by which inmates may make formal reports, to include verbal, written, anonymous, and third-party reports. Inmates are provided detailed instructions, contact persons, phone numbers, and physical addresses for correspondence where incidents or suspicions of sexual abuse, sexual harassment, and retaliation may be reported. To test the functionality of these services, the auditor utilized the weblink on the CCNO website to submit a written test complaint. In response, the auditor received responsive comments from the agency within one business day. Additionally, while inmates are not encouraged to utilize rape counseling support service centers as reporting avenues, they will also serve in this capacity if explicitly requested by the inmate. With this in mind, the auditor solicited inmate contact information from two rape counseling centers central to the CCNO and from a nationally based referral service. The referral service, Just Detention International, indicated that it did not receive any complaints of sexual abuse or sexual harassment from inmates assigned to the CCNO within the reporting time frame. The Williams County Victim Assistance and The Center for Child and Family Advocacy, local rape counseling advocacy services, were also contacted and asked to provide relevant information specific to the CCNO PREA audit. Lastly, the auditor conducted a testing of the PREA Hotline number commonly referenced by inmates. In doing this, a confirmation response was received the same business day. In interviewing correctional staff, all such persons were aware that inmates could report allegations of sexual abuse and sexual harassment verbally, in writing, anonymously, and through a third party. When receiving verbal reports of sexual abuse and sexual harassment, all staff recognized the need to take immediate action to protect the inmate in question and the need to document the verbal complaint as soon as possible. In speaking with inmates, all persons were aware of their right to be free from sexual abuse and sexual harassment, as well as their right not to suffer retaliation for having reported such abuse. All inmates understood their right to make verbal and written complaints. The majority of inmates understood their right to make anonymous and third-party complaints. As such, it is evident that the CCNO has met the requirements of this standard.

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #5001, Internal Investigations, 3-28-24
- CCNO Memo, Reporting Methods for Inmates, 3-26-24
- CCNO Inmate Rules of Conduct and Handbook, English, 2023
- CCNO Inmate Rules of Conduct and Handbook, Spanish, 2021
- CCNO PREA Pamphlet, English, 10-12-18
- CCNO PREA Pamphlet, Spanish, 10-12-18
- CCNO Inmate Request: 5-4-24, 4-24-24, 4-23-24, 3-18-24, 3-12-24, 3-5-24, 3-4-24, 2-28-24, 2-27-24, 2-21-24, 2-18-24

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
Facility Administrator
- Intermediate or Higher-Level Facility Staff
 - Investigative Staff
 - Random Inmates

Site Review Observations:

- Reviewed complaint submission process.

Standard Subsections:

(A) Per policy (#5002), the CCNO Inmate Handbook, and CCNO PREA Pamphlets, the CCNO does have administrative procedures to address inmate complaints and grievances regarding sexual abuse and sexual harassment. Inmates may submit sexual abuse or sexual harassment complaints using a grievance form or any other means of communication with staff.

(B) Policy (#5002) does not impose a time limit for inmates to submit reports of sexual abuse and sexual harassment through the appropriate channels. In doing so, inmates are not required to first attempt to resolve their concerns with the subject staff member.

(C) Policy (#5002) permits inmates to submit reports of sexual abuse and sexual harassment without first attempting to resolve the complaint informally or through the person with whom the complaint is against. When submitted, a complaint is subsequently processed by the institutional investigator, not the person with whom the complaint is against.

(D) Policy (#5001) permits inmates to submit grievances regarding allegations of sexual abuse and sexual harassment. This grievance is then processed by the institutional investigator. A final decision on all allegations of sexual abuse and sexual harassment shall be issued by the institutional investigator within ninety (60) calendar days of the initial filing. If ninety (60) calendar days is not sufficient to make an appropriate decision, the Executive Director may extend the decision. The inmate shall be notified in writing of such extension and be provided a date by which a decision will be made.

(E) Policy (#5001) permits third party reporting of sexual abuse or sexual harassment. Third-party complaints will be accepted in any manner received. Further information on how to make third-party complaints on behalf of inmates, to include contact information, is easily accessible on the agency website.

(F) Policy (#5002, #5001, #4101) does allow inmates to file sexual abuse and sexual harassment complaints. Agency policy then requires that if this complaint is deemed an emergency, the inmate shall be notified of the initial response within forty-eight (48) hours of the receipt of the grievance. The documented final decision shall be made within five (5) calendar days of the initial report and shall document the institution's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken. The inmate shall also be notified of the final decision within five (5) calendar days of the initial report.

	<p>(G) Policy (#5002, #5001, #4101) requires that disciplinary action may only be taken when it is determined that an inmate made a false report of sexual abuse or sexual harassment.</p> <p>Reasoning & Findings Statement:</p> <p>This standard works to ensure inmate access to courts by way of exhausting administrative remedies specific to allegations of sexual abuse and sexual harassment. CCNO does permit inmates to submit grievances alleging sexual abuse and sexual harassment. All allegations of sexual abuse or sexual harassment are investigated by the Institutional Investigator. The Institutional Investigator, in coordination with the Executive Director, processes all grievances as formal investigations. During the audit time frame, however, the CCNO did not received any grievances from inmates regarding sexual abuse or sexual harassment.</p>
--	---

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO PREA Orientation Video · CCNO Zero Tolerance Poster, English · CCNO Zero Tolerance Poster, Spanish · CCNO Zero Tolerance Poster, Right to Report, English · CCNO Zero Tolerance Poster, Right to Report, Spanish · CCNO PREA, Prevent, Detect, & Respond Poster, English · CCNO PREA, Prevent, Detect, & Respond Poster, Spanish · CCNO PREA, Report Sexual Assault Poster, English · CCNO PREA, Report Sexual Assault Poster, Spanish

- CCNO Inmate Rules of Conduct and Handbook, English, 2023
- CCNO Inmate Rules of Conduct and Handbook, Spanish, 2021
- CCNO PREA Pamphlet, English, 10-12-18
- CCNO PREA Pamphlet, Spanish, 10-12-18
- CCNO National, State, and Local Contact Information for Rape Crisis Programs in Ohio
- CCNO SART Clinic Flyer
- CCNO MOU Williams County Sheriff's Office, 5-7-21
- CCNO Williams County Sheriff, SOP Sexual Assault Investigations, 2-6-09
- CCNO Memo, SANE Exams, 4-11-24
- CCNO Memo, SANE Exams, 4-25-24
- CCNO Incident Report, 10-19-23
- CCNO Williams County Victim Assistance MOU, 4-19-21
- CCNO Williams County Victim Assistance MOU, 2-12-24
- CCNO Licensed Social Worker, 5-31-22
- CCNO Ohio Professional License: 5-31-22, 12-6-22, 6-27-23
- CCNO Memo, Victim's Assistance, 3-25-24
- CCNO Inmate Request: 5-4-24, 4-24-24, 4-23-24, 3-18-24, 3-12-24, 3-5-24, 3-4-24, 2-28-24, 2-27-24, 2-21-24, 2-18-24
- CCNO Incident Report, 10-19-23
- CCNO National Hotline for Crime Victims Phone Calls: March 1, 2023 to February 29, 2024

Interviews:

- Agency Head
- Agency PREA Coordinator

PREA Compliance Manager

Facility Administrator

- Intermediate or Higher-Level Facility Staff
- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel of Parkview Bryan Hospital
- Mailroom Staff
- Random Staff
- The Center for Child and Family Advocacy
- Williams County Victim Assistance
- Just Detention International
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Reviewed documentation related to inmate reports of sexual abuse and sexual harassment.
- Observed PREA information and support service pamphlets available for inmate use within the facility Law Library and inmate housing areas.
- Observed inmate general visitation and legal visitation PREA informational posters.
- Observed visitation area designated for members of an approved victim advocate services.
- Observed PREA information available on inmate tablets, in English and Spanish.
- Observed PREA informational video.
- Tested PREA Hotline number inmates can use to engage inmate reporting.
- Tested the National Hotline for Crime Victims.
- Reviewed Williams County Victim Assistance website.

- Reviewed The Center for Child and Family Advocacy website.

Standard Subsections:

(A) Policy (#5002) requires that “the CCNO shall 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.” At the time of the onsite audit, the CCNO Sexual Assault Prevention pamphlet provided only the phone number for the National Center for Victims of Crime, which is a referral service for advocacy resources. Corrective action was taken to include the phone number and mailing address for Just Detention International, as well as the Rape, Abuse, Incest, National Network, which are both actual advocacy services that can provide confidential emotional support to victims of sexual abuse. As well, additional contact information for national, statewide, and local rape crisis centers serving each Ohio county was posted in all inmate housing units. As such, no further action is required. Per the agency PREA Compliance Manager, the CCNO does not detain inmates solely for civil immigration purposes. Nonetheless, information on how to contact relevant consular officials, as well as the Department of Homeland Security, is available in the facility’s Law Library. When interviewed, all inmates knew that the agency provided free rape crisis support services or mental health services to inmates in need of such assistance. Additionally, all inmates were aware of at least one means by which they could contact rape crisis support services, with most inmates knowing that they could access those services by way of the phone number (aka the PREA Hotline) provided via the PREA pamphlet, which is continuously available to inmates on their tablets. Documentation review reflects inmates’ awareness, and subsequent use of, the previously published National Center for Victims of Crime referral service during the audit time frame.

(B) Per policy (#5002) the agency does provide toll-free telephone calls to rape crisis advocates. Policy (#5002) also allows that communication between inmates and advocates within these rape crisis centers is as confidential as possible; however, inmates are clearly notified that these telephone calls are not confidential. In speaking with Mailroom staff, it was further noted that outgoing mail to rape crisis centers is not restricted or monitored to any extent greater than other outgoing legal/ special correspondence. In this respect, inmates may seal this outgoing mail and send it without prison inspection.

(C) The CCNO has negotiated a contract between itself and Williams County Victim Assistance to help provide rape crisis support services as requested by inmates assigned to the CCNO. It should be noted that per the Director of the Williams County

Victim Assistance program, it is a standalone governmental agency. While Williams County Victim Assistance does work with the Williams County Sheriff's Office and the Williams County Prosecutor's Office to provide victim advocacy during criminal investigations and subsequent prosecutions, the Williams County Victim Assistance program is not affiliated with either agency nor is it part of the county's criminal justice system. The CCNO does maintain, and did supply, a MOU between CCNO and Williams County Victim Assistance for review. It should be noted that as a Williams County facility, victims of sexual abuse within the CCNO also have access to the nearby SART Clinic. Advocacy services for the SART Clinic are provided by various local rape crisis centers, with The Center for Child and Family Advocacy being the primary contributor. As noted by hospital/SART staff, victims of sexual abuse are provided advocacy services during forensic exams. This advocacy, including confidential emotional support and recovery services, will continue for as long as the victim requests said services.

Reasoning & Findings Statement:

This policy works to ensure that inmates assigned to the CCNO have access to outside confidential rape crisis support services and that access is provided in the most confidential manner as possible. At the time of the onsite audit, the CCNO Sexual Assault Prevention pamphlet provided only the phone number for the National Center for Victims of Crime, which is a referral service for advocacy resources. Corrective action was taken to include the phone number and mailing address for Just Detention International, as well as the Rape, Abuse, Incest, National Network, which are both actual advocacy services that can provide confidential emotional support to victims of sexual abuse. As well, additional contact information for national, statewide, and local rape crisis centers serving each Ohio county was posted in all inmate housing units. As such, no further action is required. The CCNO has also secured a memorandum of understanding with a local rape crisis center, Williams County Victim Assistance, for emotional support, as well as other recovery services. By use of the local SART Clinic for forensic exams, victims of sexual abuse are given additional advocacy resources via The Center for Child and Family Advocacy. Lastly, the CCNO has trained staff to serve as victim's advocates in the event that advocates for community rape crisis centers are not available. When interviewed, all staff and inmates knew that the agency provided free emotional support and mental health services to inmates upon request. As well, many inmates knew that they could initiate access to those services by contacting the rape crisis center using the information provided in the PREA pamphlets or posted on the PREA awareness posters predominately displayed throughout the facility. As such, the CCNO has met the minimum standards of this provision.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO Webpage Information

Interviews:

- Agency Head
- Agency PREA Coordinator

PREA Compliance Manager

Facility Administrator

Agency Website Third Party Reporting Coordinator

- Intermediate or Higher-Level Facility Staff
- Investigative Staff
- Random Inmates
- The Center for Child and Family Advocacy
- Williams County Victim Assistance
- Just Detention International

Site Review Observations:

- Reviewed CCNO website specific to PREA and third-party reporting methods
- Tested CCNO online third-party reporting system.
- Tested PREA Hotline number inmates can use to engage third-party reporting.
- Observed informational postings and other publications throughout the inmate housing areas.
- Observed PREA reporting information available in the Law Library and via

inmate tablets.

Standard Subsections:

(A) Policy (#5002) allows for the use of third-party reporting on allegations of sexual abuse and sexual harassment. During the onsite review, signage throughout the facility encouraged inmates to third-party report if needed. As well, when in use, public notices on PREA reporting, specifically third-party reporting, were available for review via the facility's Inmate Visitation Room. Additionally, public notice on third party PREA reporting is available to the general public on the agency's website. To verify the system was operational, the auditor submitted a test email to the agency's online reporting address, with responsive comments being returned in a timely manner. As well, the PREA Hotline used by incarcerated individuals was also tested for functionality and service. A response was received back from the hotline and forwarded to the facility on the same business day. Documentation review reflected that CCNO staff would accept, and does process, third-party PREA allegations to the same extent as complaints made by affected inmates. All staff interviewed confirmed that the CCNO would accept third-party reports of sexual abuse. As well, most inmates interviewed believed that the facility would accept, and take seriously, any allegations of sexual abuse reported by a third party.

Reasoning & Findings Statement:

This standard works to ensure a publicly available third-party reporting mechanism exists for claims of sexual abuse and sexual harassment being inflicted upon inmates. In accordance with policy (#5002), the CCNO promotes the use of third-party reporting via informational posters spread out across the facility, to include the Inmate Visitation Area. Electronic contact information is freely distributed on the agency's website to allow the general public direct access to reporting information. To ensure the functionality of the CCNO site, all electronic links were tested and found to be operating as required. To ensure the functionality of the CCNO online third-party reporting system, a test submission was successfully sent. As well, PREA informational posters and the inmate PREA training video also provide inmates with the agency telephone number, physical address, and electronic contact methods that can be used to make third-party reports. While inmates themselves should not be able to access Internet resources, they can communicate this reference information to their family, friends, and personal advocates. Inmates themselves are provided numerous state and advocacy addresses to submit third-party correspondence. As well, inmates may also make third-party complaints via any staff member or other PREA reporting mechanisms, such as the PREA Hotline. The PREA Hotline was tested for functionality and service. When interviewed, all staff were aware that the facility would accept and investigate third-party complaints of sexual abuse and sexual

	harassment from inmate advocates. Accordingly, the CCNO has meet the provisions of this standard.
--	---

115.61 Staff and agency reporting duties	
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO Pre-Service Training, Lesson Plan, 8-14-20 · CCNO Pre-Service Training, Lesson Plan, 5-3-18 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Head • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff • Investigative Staff • Medical Staff • Mental Health Staff • Random Staff • Random Inmates • Inmates Who Disclosed Sexual Victimization During Risk Screening <p>Site Review Observations:</p>

- Employee training records

Standard Subsections:

(A) Policy (#5002) mandates that all employees must immediately report all knowledge, suspicion, or information of any sexual misconduct that occurred within the correctional institution. As well, staff have an affirmative duty to report all knowledge, suspicion, or information regarding retaliation against inmates or staff for having reported an incident of sexual abuse and sexual harassment. Staff also have an affirmative duty to report any negligence or violation of responsibilities that may have contributed to an incident of sexual abuse, sexual harassment, or retaliation. A review of employee training records, as well as training curriculums, reflects that all CCNO staff had received initial PREA training, including acknowledgment of their affirmative duty responsibilities. When interviewed, all staff confirmed their obligation to immediately report any information they might have regarding allegations of sexual abuse and sexual harassment.

(B) Policy (#5002) notifies all staff that any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to make treatment, investigation, and other security and management decisions. As such, employees are cautioned to share reported information only with authorized staff. Random staff interviews confirm that facility employees are aware of the sensitive and confidential nature of said complaints. In speaking with the CCNO PREA Compliance Manager, the totality and reasoning surrounding the confidential investigatory process was clearly explained.

(C) Policy (#5002) requires that medical and mental health practitioners have a duty to disclose their mandatory reporting status, including limitations of confidentiality. During the medical/mental health services staff interview, the need for medical staff to inform inmates (at the initiation of professional services) of their duty to report, as well as to their limitations of confidentiality, was affirmed.

(D) All inmates incarcerated within the CCNO are legally classified as adults. As such, there aren't any juveniles assigned to this facility. However, per policy (#5002), "if the alleged victim is under the age of 18 or considered a vulnerable adult under State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting

laws.” Per the PREA Compliance Manager, during the audit time frame, CCNO did not have any (0) instances of required reporting for vulnerable adults.

(E) Policy (#5002) mandates that all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, are referred to the CCNO designated investigators for processing. When interviewing random facility staff, all employees affirmatively responded that any reports of sexual abuse and sexual harassment received by them would be immediately referred to supervisory and/or other entities appropriate for further investigations.

Reasoning & Findings Statement:

This standard works to ensure mandatory staff and agency reporting requirements. Agency policy mandates staffs’ duty to report all allegations of sexual abuse and sexual harassment. Policy further stresses the importance of confidentiality as it applies to reported incidents of sexual abuse and sexual harassment. Lastly, policy requires that all medical and mental health staff disclose their limits of confidentiality and obtain informed consent prior to the initiation of services. In interviewing correctional staff, both uniformed and non-uniformed, all employees expressed an understanding of policy. Training records and course curriculums document correctional staff training specific to mandatory reporting requirements. In interviewing CCNO medical and mental health staff, the process of limited confidentiality and informed consent used by said staff was explained in detail. As well, training records for the specialized training of medical staff document an understanding of mandatory reporting requirements. As such, the CCNO meets the provisions established within this standard.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents: <ul style="list-style-type: none">· CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21· CCNO #4103, Segregation Housing, 5-8-23· CCNO Memo, No Instances of Substantial Risk, 4-11-24

· CCNO Memo, No Instances of Substantial Risk, 4-1-24

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Investigative Staff
- Intake Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Medical Staff
- Mental Health Staff
- Random Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of retaliation monitoring documentation

Standard Subsections:

(A) Per policy (#4101), when the CCNO learns that an inmate is subject to a substantial risk of imminent sexual abuse, agency officials have an affirmative duty to

take immediate action to protect the inmate. During the onsite portion of the audit, a full size, fully concealing bathroom door was observed unlocked in the kitchen, with access to this lockable space completely controlled by inmates. To prevent this area from becoming a potential spot where inmates could isolate other inmates expectedly outside of staff awareness, a small window was placed on the door to allow staff the ability to observe the upper torso of inmates while in the restroom area. Throughout the remainder of the onsite inspection, there weren't any other areas noted as possible/potential risks to inmates' sexual safety. In speaking with the CCNO PREA Compliance Manager, CCNO Facility Warden, CCNO Risk Screeners, and random staff, a plethora of possible options were discussed specific to other possible inmate protection measures should inmates believe they were at a substantial risk of imminent sexual abuse. However, as the CCNO did not find any evidence within the audit time frame that any (0) inmates assigned to the facility who were at an actual substantial risk of sexual abuse, the facility did not have any documentation for review. Likewise, no protective actions were required.

Reasoning & Findings Statement:

This standard works to actualize the processes of inmate protection. Agency policy (#4101) requires staff to take immediate action to ensure the safety of all inmates who are at a high risk of sexual victimization. Provided there are no other alternative options available to ensure the inmate's safety, policy (#4103) further allows the facility to immediately increase the safety of the at-risk inmate by placing said inmate in the involuntary segregated housing. However, placement in involuntary segregated housing would only be used if no other general housing assignments available could ensure inmate safety. During the audit time frame, the CCNO did not receive any reports from inmates who were at a substantial risk of sexual abuse. It should be noted that during the onsite portion of the audit, a full size, fully concealing bathroom door was observed unlocked in the kitchen, with access to this lockable space completely controlled by inmates. To prevent this area from becoming a potential spot where inmates could isolate other inmates expectedly outside of staff awareness, a small window was placed on the door to allow staff the ability to observe the upper torso of inmates while in the restroom area. Throughout the remainder of the onsite inspection, there weren't any other areas noted as possible/potential risks to inmates' sexual safety. In interviewing random staff, all persons were asked specifically what actions would be taken if an inmate presented as a high risk for sexual victimization. Unequivocally, all staff responded that they would take immediate action to protect the potential victim. Additionally, supervisory staff were questioned as to their role in this potentially dangerous situation. While supervisory staff did provide a more technical and inclusive response, they too, were centrally focused on protecting the inmate. Hence, the CCNO has clearly realized the provisions of this standard and no further action is needed.

115.63 Reporting to other confinement facilities

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO Notification to Another Facility, 10-17-23
- CCNO Booking Summary, 10-16-24
- CCNO Incident Report, 10-16-23
- CCNO Notification to Another Facility, 7-27-23
- CCNO Booking Summary, 7-25-23
- CCNO Incident Report, 7-25-23

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of facility-to-facility referral process.

Standard Subsections:

(A) CCNO policy (#5002) requires that when a facility receives notice regarding allegations of sexual abuse and sexual harassment occurring at another facility, the receiving facility must provide written notice of these allegations to the facility head of the destination facility within 72 hours. A review of documents within the audit time frame reflects that there have been twenty-three (23) referrals made from CCNO to another facility and one (1) referral received by CCNO from another facility. Documentation of the referral process was reviewed.

(B) Per CCNO policy (#5002), written notice of the aforementioned allegations must be provided as soon as possible, but not more than 72 hours after learning of the allegations. The CCNO Executive Director confirmed that all notices are sent by the Executive Director's Office to the destination facility as soon as possible, but certainly within 72 hours.

(C) When received, the CCNO does document this notification through the use of an Incident Report (1032-A Form) in accordance with policy (#5002).

(D) Upon receipt of said allegations, policy (#5002) requires that the Warden of the destination facility must then process these allegations in accordance with standard protocol. During the audit time frame, the CCNO received one (1) allegation from other facilities.

Reasoning & Findings Statement:

This policy works to ensure agency staff are provided sufficient due process with respect to the timely notification of inmate allegations involving sexual abuse and sexual harassment. A review of documents within the audit time frame reflects that there have been twenty-three (23) referrals made from CCNO to another facility and one (1) referral received by CCNO from another facility. Documentation of the referral process was reviewed. Additionally, the Executive Director provided an explanation of this process, to include required reporting timelines. Agency policy, referral documentation, staff comments, and an explanation of the collaborative processes all reflect that the CCNO has satisfied the provisions of this standard.

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #5002-A, Sexual Assault First Responder, 4-20-21
- CCNO #5002-B, Inmate on Inmate Sexual Assault, 4-20-21
- CCNO Memo, First Responder Actions, 5-3-24

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Investigative Staff
- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel of Parkview Bryan Hospital
- Random Staff
- Security Staff and/or Non-Security Staff Who Have Acted As First Responders
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of employee training records.
- Review of investigator narrative case files.

Standard Subsections:

(A) Policy (#5002) requires the first responding security staff member to immediately separate the alleged victim and abuser. After ensuring the safety of the victim, policy (#5002) requires staff to preserve and protect the crime scene until evidence collection is possible. If the first responder learns that the victim has been sexually abused, and the abuse occurred within a time period that still allows for the collection of physical evidence, the first responder should 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. Once the first responder learns that an inmate has been sexually abusive, and the abuse occurred within a time period that still allows for the collection of physical evidence, the first responder should 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. Within the audit time frame, CCNO has received six (6) allegations from inmates who claim to have been victims of sexual abuse. Interviews with first responders, as well as documentation related to such, reflects that staff took the appropriate actions required of their role consistent with policy. As well, during contractor and volunteer interviews, it was noted that all contractors and volunteers understood the absolute need to protect the victim, as well as a need to preserve and protect the crime scene or evidence that could be available, as well as notify supervisory staff.

(B) Policy (#5002) requires that non-security first responders to instruct the victim not to take any action that could destroy physical evidence and then notify security staff. Within the audit time frame, CCNO has received six (6) allegations from inmates who claim to have been victims of sexual abuse. In these, none (0) of the claims were made to non-security staff. Interviews with first responders, as well as documentation related to such, reflects that staff took the appropriate actions required of their role consistent with policy.

Reasoning & Findings Statement:

This standard works to determine whether facility staff understand their role when

	<p>responding to inmate allegations of sexual abuse and sexual harassment. Of primary importance is separating and securing the alleged victim and abuser. Of this, all staff interviewed absolutely articulated that point. The majority of staff then articulated the need to preserve any evidence possibly remaining at the crime scene and on the alleged victim. A review of employee training records and class curriculums reflect staff have received required training specific to the preservation of evidence regarding allegations of sexual abuse and sexual harassment. The immediate notification of a security supervisor provides assurance that all subsequent critical steps will be followed. This information, combined with agency policy, staff interviews, facility training documentation, and the review of documentation related to the PREA initiation process sufficiently supports the expectations required by this standard.</p>
--	---

115.65 Coordinated response	
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Head • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff • Designated Staff Member Charged with Monitoring Retaliation • Incident Review Team Member • Investigative Staff • Medical Staff • Mental Health Staff

- SANE/SAFE Personnel of Parkview Bryan Hospital
- Random Staff
- Security Staff and/or Non-Security Staff Who Have Acted As First Responders
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of departmental level facility processes

Standard Subsections:

(A) The CCNO has developed a written institutional plan; namely, CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21, to coordinate actions amongst first responders, medical and mental health practitioners, investigators, and facility leadership in response to incidents of sexual abuse and sexual harassment.

Reasoning & Findings Statement:

This provision works to coordinate facility efforts so that victims of sexual abuse and sexual harassment receive adequate support services. To coordinate facility efforts in the most efficient manner possible, the CCNO implemented a unit-based policy, CCNO #5002, that details the coordinated response plan to an incident of inmate sexual abuse. In this, the roles of all facility staff are discussed and, perhaps even more importantly, the way those roles interact with one another are outlined. This policy is a conveniently written overview of departmental responsibilities, equipped with notification and referral reminders. When asked, various departmental staff were able to articulate their role in the response process. As well, during inmate interviews, many were able to articulate the responsibilities of responding staff; thus, demonstrating this process has been institutionalized within the facility. As such, the CCNO has met all the provisions within this standard.

115.66

Preservation of ability to protect inmates from contact with abusers

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #1011, Management Rights
- CCNO MOU with the CCNO Corrections Officers Association, 6-30-24
- CCNO MOU with the CCNO Supervisors Association, 6-30-24

Interviews:

- Agency Head
- Agency Contract Administrator
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Administrative (Human Resources) Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed agency labor contracts.

Standard Subsections:

(A) Per policy (#5002, 1011), the agency is prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. Current contracts between the CCNO and the CCNO Correctional Officers Association, as well as the CCNO Supervisor's Association, ensures that the CCNO retains the management rights for facilitates to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

(B) The auditor is not required to audit this provision.

Reasoning & Findings Statement:

This provision allows the agency to protect inmates from having contact with sexual abusers and sexual harassers. Policy (#5002, 1011) allows for employees to be suspended from duty pending the outcome of a sexual abuse or sexual harassment investigation. In speaking with investigative staff and the CCNO Executive Director, the process of suspending or separating an employee from employment as a function of a negative sexual abuse or sexual harassment investigation finding was explained. It was also noted that CCNO unit administration has no reservations about discharging employees for engaging in sexual abuse and sexual harassment. Hence, the CCNO has satisfactorily met all provisions within this standard.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #5001, Internal Investigations, 3-28-23 <p>Interviews:</p>

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Investigative Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Random Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed sexual abuse/harassment case files.
- Reviewed process for utilizing retaliation monitoring logs.

Standard Subsections:

(A) Policy (#5002, #5001) prohibits retaliation for reporting sexual abuse or sexual harassment and for cooperating with a sexual abuse and sexual harassment investigations. In accordance with these policies, the CCNO Classification Officers monitors all inmates for possible retaliation. The CCNO Human Resource Manager monitors all staff for possible retaliation resulting from cases of sexual abuse or sexual harassment.

(B) Per policy (#5002, #5001), the institution shall 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 and staff who fear retaliation for reporting sexual misconduct or for cooperating with investigations. Conversations with Classification staff detailed possible measures that could be used to prevent or address suspected

retaliation.

(C) Per policy (#5002, #5001), for a minimum of 90 days following a report of sexual abuse or sexual harassment, the facility shall monitor the conduct and treatment of:

- a. An inmate or staff who reported an incident of sexual abuse or sexual harassment (including a third-party reporter)
- b. An inmate who was reported to have suffered sexual abuse or sexual harassment; and
- c. An employee who reported an incident of sexual abuse or sexual harassment of an inmate.
- d. Monitoring staff shall employ multiple protection measures to prevent inmate retaliation, such as reviewing inmate disciplinary, housing changes, job changes, and program changes.
- e. Monitoring staff shall employ multiple protection measures to prevent staff retaliation, such as negative performance reviews for staff and the reassignment of staff.
- f. Monitoring shall go beyond 90 days if the initial monitoring indicates a continuing need.
- g. Within the audit time frame, the CCNO has not had a reported incident of retaliation.

(D) Per policy (#5002, #5001), in the case of inmates, such monitoring shall also include periodic in-person status checks at least every 30 days. Documentation reflects that retaliation monitoring is scheduled and conducted in accordance with policy. Within the audit time frame, there have not been any (0) acts of retaliation noted for having engaged the PREA process.

(E) Per policy (#5002, #5001), if any other individual (staff, volunteer, contractor, inmate, etc.) who cooperates with an investigation expresses a fear of retaliation, the facility and agency shall take appropriate measures to protect that individual against retaliation. Documentation reflects that within the audit time frame, there have not been any (0) expressed concerns of fear for retaliation due to having cooperated with, or having engaged, the PREA process.

(F) The auditor is not required to audit this provision.

	<p>Reasoning & Findings Statement:</p> <p>This standard works to prevent retaliation against employees and inmates for reporting sexual abuse and sexual harassment or for having cooperated with an investigation into such. CCNO policy provides a comprehensive overview of agency protection against sexual abuse and sexual harassment. In speaking with inmates, none noted that they had ever experienced retaliation for participating in a PREA related facility investigation. Both the CCNO Classification Officer and the CCNO Human Resource Officer provided detailed explanations of the monitoring process. In speaking with inmates who had filed previous allegations of sexual abuse and sexual harassment, none stated that they had experience retaliation as a function of their reports. The auditor also reviewed the monitoring details of case files associated with incarcerated individuals. All inmates associated with these files were monitored for at least 90 days following the allegations, with status checks being conducted approximately every 30 days. Given the totality of the policies provided, document review, and staff knowledge regarding the process, the CCNO has satisfied the basic provisions of this standard.</p>
--	--

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #4103, Segregation Housing, 5-8-23 · CCNO Memo, No Subsequent Placement within Involuntary Segregated Housing, 3-11-24 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency PREA Coordinator • PREA Compliance Manager

- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Random Staff
- Staff Who Supervise Inmates in Segregated Housing
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Observed the involuntary segregated housing.

Standard Subsections:

(A) Policy (#4103) prohibits placing inmates who allege sexual abuse, or those to be at a high risk of sexual abuse, in involuntary segregated housing unless an assessment of all other available alternatives has been made and a subsequent determination finds that there are no available alternatives means of separation from likely abusers. As confirmed by the CCNO Warden, within the audit time frame, the CCNO has not placed any (0) inmates who have alleged sexual abuse or who are at a high risk of sexual abuse in the involuntary segregated housing pending completion of their assessment.

Reasoning & Findings Statement:

Agency policy strictly prohibits the use of involuntary segregated housing as a de facto response to sexual safety concerns of inmates. Rather, as explained by the CCNO PREA Compliance Manager, the use of involuntary segregated housing should be considered only as the last available option, and even at that, as only a temporary measure. While conversations with the CCNO Warden and the CCNO PREA Compliance Manager did indicate that if absolutely necessary, inmates would be placed in involuntary segregated housing, it would be their absolute last option. Within the reporting time frame, CCNO did not place any (0) inmates alleging sexual abuse or sexual harassment within involuntary segregated housing. In speaking with inmates who had filed previous allegations of sexual abuse and sexual harassment,

	<p>none stated that they had been placed in involuntary segregated housing solely as a function of their reports. As such, the CCNO has satisfied the requirements of this provision.</p>
--	---

115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #5001, Internal Investigations, 3-28-23 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Head • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff • Investigative Staff • Random Staff • Random Inmates • Inmates Who Disclosed Sexual Victimization During Risk Screening <p>Site Review Observations:</p> <ul style="list-style-type: none"> • Reviewed investigator training certifications. • Reviewed agency training records documenting investigator training

curriculums.

- Reviewed twelve (12) sexual abuse/sexual harassment case files.

Standard Subsections:

(A) Agency policy (#5001) requires that “when the CCNO conducts its own investigations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.” In speaking with the agency investigator, adherence to that requirement was stressed. As well, a review of all investigations conducted within the audit timeframe reflects agency policy.

(B) Agency policy (#5001) requires that investigators to have received specialized training in excess of the generalized sexual abuse and sexual harassment training provided to other staff. In interviewing the CCNO Investigator, said staff confirmed participation in numerous related courses, to include Investigating Sexual Abuse in a Confinement Setting. Additionally, employee training certifications, as well as completed training rosters, provide additional documentation to support facility compliance.

(C) Agency policy (#5001) requires that Investigators “gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.” In speaking with the agency investigator, adherence to that requirement was stressed. As well, a review of all investigations conducted within the audit timeframe reflects agency policy.

(D) Agency policy (#5001) allows compel interviews “only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.” In speaking with the agency investigator, adherence to that requirement was stressed. As well, a review of all investigations conducted within the audit timeframe reflects agency policy.

(E) Agency policy (#5001) requires that the credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and not based on that individual’s status as an inmate or staff member. Policy (#5001) further prohibits the use of a polygraph test or other truth-telling device as a condition of investigating allegations

of sexual abuse or sexual harassment. The Investigator confirmed that the credibility of the interviewed subject is, in fact, determined on an individual basis considering the totality of the evidence presented. Reviewed documentation supports adherence to this criterion.

(F) Agency policy (#5001) requires administrative investigations to consider whether staff actions or failures to act contributed to the allegations of sexual abuse and sexual harassment. All administrative investigations are documented in written reports. As a function on that documentation, these reports should include a description of the physical evidence and testimonial evidence, the reasoning behind credible assessments, as well as investigative facts and findings. The CCNO Investigator confirms that the credibility of the interviewed subject is, in fact, determined on an individual basis considering the totality of the evidence presented. Reviewed documentation supports the facility's adherence to this policy.

(G) Agency policy (#5001) requires that all criminal investigations are documented in written reports. As a function on that documentation, these reports should include a description of the physical evidence, testimonial evidence, and documentary evidence. The CCNO Investigator confirms that the credibility of the interviewed subject is, in fact, determined on an individual basis considering the totality of the evidence presented. Reviewed documentation supports the facility's adherence to this policy.

(H) As noted by the CCNO Investigator and required by policy (#5001), all substantiated allegations of conduct that appear to be criminal in nature are referred for prosecution. In speaking with the agency investigator, adherence to that requirement was stressed. As well, a review of all investigations conducted within the audit timeframe reflects agency policy. During the audit time frame, the CCNO has referred one (1) such case for prosecution.

(I) Policy (#5001) requires that all CCNO retains all criminal and administrative agency investigations for sexual abuse "for as long as the alleged abuser is incarcerated or employed by the CCNO, plus five (5) years." In speaking with the agency investigator, adherence to that requirement was stressed.

(J) Agency policy (#5001) mandates that the departure of the alleged abuser or victim from the employment or control of the institution does not provide a basis for terminating an investigation. Interviews with investigative staff, as well as reviewed documentation, supports the facility's adherence to this policy.

(K) The auditor is not required to audit this provision.

(L) Agency policy (#5001) requires facility staff to cooperate with outside investigators and endeavor to remain informed about the progress of the investigation. In speaking with the CCNO PREA Compliance Manager and CCNO Investigator, it was noted that the agency has an MOU in place with the Williams County Sheriff Office to ensure agency investigations are conducted in accordance to the PREA Standards, which includes facilitating the transfer of information between agencies. Interviews with investigative staff, as well as reviewed documentation, supports the facility's adherence to this policy.

Reasoning & Findings Statement:

The Williams County Sheriff Office operates as the law enforcement branch inside of the CCNO. As such, the CCNO conducts its own administrative investigations via agency staff while the Williams County Sheriff Office conducts all criminal investigations for allegations of sexual abuse. To work as a criminal investigator within the CCNO, personnel must have law enforcement credentials. As well, to perform administrative investigations, CCNO staff must have met additional training requirements for conducting sexual abuse/sexual harassment investigations within a confinement setting. Law enforcement staff from the Williams County Sheriff Office do have the authority to investigate criminal cases within the CCNO, to include collecting evidence, as well as interviewing victims, suspected perpetrators, and witnesses. Law enforcement staff from the Williams County Sheriff Office have been trained on the standards of evidence required to support a finding of guilt in criminal cases. As well, law enforcement staff from the Williams County Sheriff Office have been trained on due process and procedural requirements of criminal cases. As confirmed through an interviewer with the CCNO Investigator, law enforcement staff from the Williams County Sheriff Office and CCNO investigators work collaboratively under a memorandum of understanding to facilitate communication between the two agencies. With this in mind, the CCNO has clearly met the requirements of this standard.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #5001, Internal Investigations, 3-28-23

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Investigative Staff

Site Review Observations:

- Reviewed procedures for processing sexual abuse/sexual harassment allegations.
- Reviewed twelve (12) sexual abuse and sexual harassment case files.

Standard Subsections:

(A) Policy (#5001) clearly establishes the standard of proof required to substantiate claims of sexual abuse and sexual harassment. In this, policy (#5001) requires that “the CCNO shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.” Specifically, per the CCNO Investigator, the allegations are determined substantiated, unsubstantiated, or unfounded based on the preponderance of the evidence. For substantiated claims, this simply means that the weight of the evidence must indicate that the allegations are more likely to be true than not true.

	<p>Reasoning & Findings Statement:</p> <p>Agency policy requires that the CCNO establish a standard of proof no higher than a preponderance of the evidence when determining whether allegations of sexual abuse or sexual harassment are substantiated. When interviewed, the CCNO PREA Investigator confirmed that standard of proof to be slightly more than half. Furthermore, a review of investigative case files for the audit time frame supports the agency's adherence to that standard. As such, the CCNO has satisfied all material provisions for this standard.</p>
--	---

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> • CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 • CCNO #5001, Internal Investigations, 3-28-23 • CCNO Incident Report, 10-24-23 • CCNO Memo, Investigation Ordered, 10-25-23 • CCNO Memo, PREA Investigation, 10-25-23a • CCNO Memo, PREA Investigation, 10-25-23b • CCNO Inmate Notification, 10-31-23 • CCNO Notification of Disciplinary Hearing Finding, 11-1-23 • CCNO Inmate Rule Violation Report, 10-24-23 • CCNO Inmate Notification, 1-18-24 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency PREA Coordinator • PREA Compliance Manager

- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Designated Staff Member Charged with Monitoring Retaliation
- Investigative Staff
- Random Staff
- Random Inmates

Site Review Observations:

- Reviewed procedures for processing sexual abuse and sexual harassment allegations.
- Reviewed twelve (12) sexual abuse and sexual harassment case files.

Standard Subsections:

(A) Policy (#5001) requires that “following an investigation into an inmate’s allegation that he or she suffered sexual abuse in the CCNO, the CCNO Investigator shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.” In speaking with the agency investigator, adherence to that requirement was stressed. However, it was noted that due to the nature of a jail, inmates often discharged from the system prior to completing the investigation. Equally so, inmates do not tend to leave a forwarding address for subsequent communication. As such, seven (7) of the completed twelve (12) investigations did not contain inmate notification letters as these inmates had discharged prior to concluding the investigation. However, in discussing notification attempts with the CCNO Investigator, as well as a review of notification attempts noted within the investigative file, it was clear that this individual had made all possible efforts to contact the alleged victim even after being released.

(B) Policy (#5001) further requires that “if the CCNO Investigator did not conduct the investigation, the relevant information shall be requested from the Williams County Sheriff’s Office in order to inform the inmate.” In speaking with CCNO Investigator, the communication process between institutional staff and the Williams County Sheriff’s Office was discussed. The documentation review also supports that a cooperative spirit of communications exists between the two agencies. As noted by

the CCNO Investigator, during the audit time frame, all investigative findings by the Williams County Sheriff's Office were conveyed to the CCNO for inmate notification.

(C) Policy (#5001) requires that when an inmate has filed allegations of sexual abuse against a staff member (unless unfounded), the institutional investigator shall inform the inmate upon the following:

- a. The staff member is no longer posted within the inmate's unit;
- b. The staff member is no longer employed at the facility;
- c. The CCNO learns that the staff member has been indicted on a charge related to sexual abuse within the institution;
- d. The institution learns that the staff member has been convicted on a charge related to sexual abuse within the institution.

(D) Policy (#5001) requires that when an inmate has filed allegations of sexual abuse against another inmate, the agency must notify the inmate whenever the alleged abuser has been:

- a. Indicted on a charge related to sexual abuse within the facility and
- b. Whenever the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

(E) Policy (#5001) requires that the agency issue in writing all notifications or attempted notifications of Standard 115.73, Subsections C and D, to any affected inmates. In speaking with the agency investigator, adherence to that requirement was stressed. As there weren't any substantiated allegations of sexual abuse within the audit time, there wasn't any documentation to review specific to this provision.

(F) Auditor is not required to audit this provision.

Reasoning & Findings Statement:

Agency policy requires CCNO staff to provide inmates with dispositions for all claims of sexual abuse and sexual harassment. The CCNO conducts all administrative sexual abuse and sexual harassment investigations. While all criminal sexual abuse and sexual harassment claims are addressed by the Williams County Sheriff's Office, agency staff do remain actively engaged in those investigations. Agency policy

	<p>provides that all inmates who have filed a previously substantiated sexual abuse and sexual harassment claims against agency staff or other inmates, receive notification upon a change in housing status for the inmate or a change in job status for the employee. Lastly, policy requires these notifications to be documented. Within the audit time frame, CCNO documentation reflects that whenever possible, inmates are notified of the final disposition to sexual abuse and sexual harassment claims as required by policy. In speaking with inmates who have filed sexual abuse and sexual harassment claims who are still assigned to the agency, these persons state that they were provided with a final disposition to their claims. Documentation review reflects that all inmates who were still incarcerated within the CCNO upon the conclusion of their sexual abuse or sexual harassment investigation were, in fact, notified of the outcome. As such, the CCNO has complied with all requirements within this standard.</p>
--	---

115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #6105, Employee Disciplinary Action, 10-26-21 · CCNO Memo, No Employee Violations, 5-2-24 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Head • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff • Administrative (Human Resource) Staff • Investigative Staff

- Random Staff

Site Review Observations:

- Review of staff disciplinary protocols for sexual abuse and sexual harassment determinations

Standard Subsections:

(A) Policy (#6105) clearly advises staff that all employees shall be “subject to disciplinary sanctions up to and including termination for violating CCNO sexual abuse and sexual harassment policies.” Interviews with the CCNO PREA Compliance Manager, CCNO Facility Warden, the CCNO Investigator, CCNO Human Resource Staff, and the CCNO Executive Director confirm facility adherence to agency policy specific to employee disciplinary and termination processes for any employee found to be engaging in acts of sexual abuse or sexual harassment. Interviews with random staff reflect employee awareness to zero-tolerance policies for engaging in sexual abuse and sexual harassment of inmates. During the audit time frame, there have not been any (0) staff found to have engaged in acts of sexual abuse or sexual harassment.

(B) Policies (#6105) continues by noting that any perpetrator of a sexual abuse or sexual harassment will be dealt with through discipline or prosecution as required by law. In this, termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse of an inmate. Within the audit time frame, there have not been any (0) employees who terminated or resigned prior to termination due to having engaged in an appropriate sexual relationship with inmates.

(C) Policies (#6105) stipulates disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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. Interviews with the CCNO PREA Compliance Manager, CCNO Warden, CCNO Investigator, CCNO Human Resource Staff, and the Executive Director confirm their adherence to agency policy specific to employee disciplinary and termination processes for any employee found to be engaging in acts of sexual abuse or sexual harassment. Within the audit time frame, there haven't been any (0) employees assigned to the CCNO disciplined for violation of agency policy related to sexual abuse or sexual harassment.

(D) Policy (#6105) notes that “all terminations for violations of CCNO sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and any relevant licensing bodies.” Within the audit time frame, the CCNO has not reported any (0) employees to law enforcement for any violation of agency sexual abuse or sexual harassment policies.

Reasoning & Findings Statement:

This standard works to ensure agency staff understand the gravity and the criminal nature of engaging in sexual abuse or sexual harassment of inmates. The CCNO has made the consequences of engaging in such behavior exceptionally clear. Within the audit time frame, there have not been any (0) staff members assigned to the CCNO who have violated aspects of the agency’s sexual abuse or sexual harassment policies. During staff interviews, all staff expressed their knowledge of the agency’s zero tolerance policy. As such, the CCNO has satisfied all provisions within this standard.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO Memo, No Contractor or Volunteer Violation of PREA Policy, 5-6-24 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency Contract Administrator • Agency PREA Coordinator • PREA Compliance Manager

- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Investigative Staff
- Administrative (Human Resources) Staff
- Contractors Who May Have Contact With Inmates
- Volunteers Who May Have Contact With Inmates

Site Review Observations:

- Review contractor/volunteer files

Standard Subsections:

(A) Policy (#5002) mandates that “any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.” A review of contractor and volunteer PREA training documentation indicates that all such persons are aware of agency policy regarding the sexual abuse and sexual harassment of inmates. Interviews with contracted staff and volunteers evidenced that the agency’s zero-tolerance policy is institutionalized. During the audit time frame, there weren’t any contractors or volunteers found to have engaged in sexual abuse or sexual harassment of inmates. As such, there wasn’t any relevant documentation to review.

(B) Policy (#5002) states that “the facility shall take appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of CCNO sexual abuse or sexual harassment policies by a contractor or volunteer.” A review of contractor and volunteer PREA training documentation indicates that all such persons are aware of agency policy regarding the sexual abuse and sexual harassment of inmates. Interviews with contracted staff and volunteers evidenced that the agency’s zero-tolerance policy is institutionalized. During the audit time frame, there weren’t any contractors or volunteers found to have engaged in sexual abuse or sexual harassment of inmates. As such, there wasn’t any relevant documentation to review.

	<p>Reasoning & Findings Statement:</p> <p>Policy expressly states that contactors and volunteers who engage in sexual abuse with inmates will be prohibited from contact with inmates and shall be reported to law enforcement agencies and relevant licensing bodies. Within the audit time frame, the CCNO has not had any contractors or volunteers engage in sexual abuse or sexual harassment of any inmate. During CCNO contractor and volunteer interviews, both the prohibition against sexual abuse and sexual harassment of inmates, as well as the consequences of having engaged such, were clearly known. Documentation of contractor and volunteer training records further supports this assertion. Hence, the provisions of this standard have been met and CCNO is in compliance with such.</p>
--	--

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #4610, Inmate Disciplinary Procedures, 3-6-23 · CCNO PREA Pamphlet, English, 10-12-18 · CCNO PREA Pamphlet, Spanish, 10-12-18 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff • Investigative Staff • Medical Staff

- Mental Health Staff
- Random Staff
- Random Inmates

Site Review Observations:

- Review of inmate disciplinary procedures.

Standard Subsections:

(A) Policy (#4610) provides the standards associated with all disciplinary hearings, to includes hearings related to inmate-on-inmate sexual abuse/sexual harassment. Policy (#4610) further notes that following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, said inmate is subject to disciplinary sanctions pursuant to formal disciplinary processes. During the audit time frame, the CCNO has not had any (0) administrative findings of inmate-on-inmate sexual abuse.

(B) Policy (#4610) ensures that disciplinary sanctions imposed are 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. As there weren't any inmates found in violation of sexual abuse or sexual harassment policies within the audit time frame, there isn't any relevant documentation to review. However, conversation with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of disciplinary hearing procedures, supports adherence to this policy.

(C) When determining an inmate's disciplinary sanctions, policy (#4610) does consider how an inmate's mental disabilities or mental illness contributed to his behavior. CCNO disciplinary procedures reflects that the mental disabilities of inmates are, in fact, given consideration during the disciplinary process. As there weren't any inmates found in violation of sexual abuse or sexual harassment policies within the audit time frame, there isn't any relevant documentation to review. However, conversation with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of disciplinary hearing procedures, supports adherence to this policy.

(D) Per policy (#4610), "if the CCNO offers therapy, counseling, or other interventions designed to address and correct underlying reason or motivations for the abuse, the CCNO shall consider whether to require the offender inmate to participate in such interventions as a condition of access to programming or other benefits." As there weren't any inmates found in violation of sexual abuse or sexual harassment policies within the audit time frame, there isn't any relevant documentation to review. However, conversation with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of disciplinary hearing procedures, supports adherence to this policy.

(E) Per policy (#4610), "the CCNO may discipline an inmate for sexual contact with staff only upon finding that the staff member did not consent to such contact or conduct." As there weren't any inmates found in violation of sexual abuse or sexual harassment policies within the audit time frame, there isn't any relevant documentation to review. However, conversation with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of disciplinary hearing procedures, supports adherence to this policy.

(F) Per policy (#4610), a report made in good faith based upon a reasonable belief that the alleged conduct did occur does not constitute falsely reporting an incident or lying for the purpose of disciplinary action, even if the investigation does not establish evidence sufficient to substantiate the allegations. conversation with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of investigative case files, supports adherence to this policy.

(G) Per policy (#4610), "the CCNO may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. The CCNO may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced." As noted within the PREA Pamphlet, sexual activity between inmates is a violation of agency policy. Conversations with the CCNO PREA Compliance Manager and the CCNO Investigator, as well as a review of disciplinary hearing procedures, supports adherence to this policy.

Reasoning & Findings Statement:

The inmate disciplinary process is a formal means to address institutional misconduct. The CCNO uses a progressive disciplinary system, which allows for consideration of aggravating and mitigating factors. Within the audit time frame, the CCNO has not processed any (0) administrative finding of guilt regarding inmate-on-inmate sexual abuse that occurred at the facility. A review of disciplinary hearing

	<p>process reflects that the mental health and of an inmate is given serious consideration in sentencing and the availability of subsequent mental health services. In considering agency policies, facility procedures, staff interviews, and inmate comments, CCNO is compliant with disciplinary standards as required under this provision.</p>
--	---

115.81 Medical and mental health screenings; history of sexual abuse	
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #4300, Medical/Mental Health Care Services for Inmates, 10-31-22 · CCNO Intake Screen, Referral: 4-18-23, 1-27-24 · CCNO Medical Staff Receiving Screening Form: 4-18-23 · CCNO Suicide Prevention Screening Guidelines Form: 4-18-23 · CCNO PREA Survey: 4-18-23, 1-28-24 · CCNO Patient’s Consent for Treatment: 4-18-23, 1-28-24 · CCNO Ohio Department of Medicaid, Appendix C: 4-18-23 · CCNO Coronavirus Screening Form: 4-18-23 · CCNO Psychological Assessment: 5-1-23, 1-30-24, 2-29-24 · CCNO Incident Report: 4-18-23 · CCNO Housing History: 4-19-24 · CCNO Providers Sick Call List: 5-1-23 · CCNO History and Physical, including additional PREA Survey: 4-25-23 · CCNO Medical & Behavioral Health Admission Care Screen: 1-28-24 · CCNO Jail Unit Profile, 10-27-23 <p>Interviews:</p>

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Intake Staff
- Investigative Staff
- Medical Staff
- Mental Health Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Observed Medical Department and Risk Screening Areas.
- Review of Medical/Mental Health PREA Screening Forms.
- Review of twelve (12) investigative case files.

Standard Subsections:

(A) Policy (#4300) requires that upon arrival, all CCNO inmates will be screened for sexual abuse risk factors. If the assessment indicates that the inmate has had prior sexual victimization, whether it occurred in an institutional setting or in the community, staff will offer a follow-up meeting with a mental health or medical practitioner within fourteen calendar days of the intake screening. Within the audit time frame, 100% of inmates received at the CCNO who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner. Interviews with inmates who reported previous sexual victimization verify receipt of said mental health consultation. Also, a review of both medical and mental health referrals, as well as conversations with medical and mental health staff, confirms the institutionalization of this practice.

(B) The CCNO is a jail facility. As such, this provision does not apply to this institution.

(C) Policy (#4300) requires that upon arrival, all CCNO inmates will be screened for sexual abuse risk factors. If the assessment indicates that the inmate has had prior sexual victimization, whether it occurred in an institutional setting or in the community, staff will offer a follow-up meeting with a mental health or medical practitioner within fourteen calendar days of the intake screening. Within the audit time frame, 100% of inmates received at the CCNO who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner. Interviews with inmates who reported previous sexual victimization verify receipt of said mental health consultation. Also, a review of both medical and mental health referrals, as well as conversations with medical and mental health staff, confirms the institutionalization of this practice.

(D) Per policy (#4300) and in accordance with the Prison Rape Elimination Act (PREA) Standards, 28 C.F.R. 115.81, “any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local laws” (#4300). As noted by medical/mental health staff during the interview process, medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

(E) Per policy (#4300) and in accordance with the Prison Rape Elimination Act (PREA) Standards, 28 C.F.R. §115.81, “any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local laws” (#4300). As noted by medical/mental health staff during the interview process, as well as directed by policy, medical and mental health practitioners “shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18” (#4300).

Reasoning & Findings Statement:

	<p>Within the audit time frame, 100% of inmates who had disclosed prior victimization during risk screening were offered a follow-up meeting with a medical or mental health practitioner. As noted by medical and mental health staff, the CCNO provides routine and regular medical screens and other health services in accordance to qualified medical assessments, as well as to policy. Documentation specific to the PREA assessment forms for medical and mental health staff reflects the appropriate use of the screening tool to determine necessary housing and medical needs. Lastly, all inmates are required to provide informed consent prior to facility staff reporting information about prior sexual victimization that did not occur in an institutional setting. As such, the facility is meeting all provisions as established within this standard.</p>
--	---

115.82	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO #4300, Medical/Mental Health Care Services for Inmates, 10-31-22 · CCNO Intake Screen, Referral: 4-18-23, 1-27-24 · CCNO Medical Staff Receiving Screening Form: 4-18-23 · CCNO Suicide Prevention Screening Guidelines Form: 4-18-23 · CCNO PREA Survey: 4-18-23, 1-28-24 · CCNO Patient’s Consent for Treatment: 4-18-23, 1-28-24 · CCNO Ohio Department of Medicaid, Appendix C: 4-18-23 · CCNO Coronavirus Screening Form: 4-18-23 · CCNO Psychological Assessment: 5-1-23, 1-30-24, 2-29-24 · CCNO Incident Report: 4-18-23 · CCNO Housing History: 4-19-24 · CCNO Providers Sick Call List: 5-1-23

- CCNO History and Physical, including additional PREA Survey: 4-25-23
- CCNO Medical & Behavioral Health Admission Care Screen: 1-28-24
- CCNO Jail Unit Profile, 10-27-23

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Medical Staff
- Mental Health Staff
- SANE/SAFE Personnel of Parkview Bryan Hospital
- Security Staff and/or Non-Security Staff Who Have Acted As First Responders
- Random Staff
- Random Inmates

Site Review Observations:

- Observed Medical Department
- Review of Medical/Mental Health Screening Form

Standard Subsections:

(A) In accordance with the CCNO policy (#4300), all “inmate victims of sexual abuse shall 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.” In interviewing medical/mental health staff, said staff confirmed the ability to treat inmates in accordance with their professional medical judgement.

(B) Policy (#4300) notes that “if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to section 115.62 and shall immediately notify the appropriate medial and mental health practitioners.”

(C) Policy (#4300) requires that inmates are “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.” In speaking with medical/mental health staff, adherence to this policy was confirmed. In speaking with SANE/SAFE personnel of the local hospital and SART clinic, it was further noted that all medical precautions, to include appropriate prophylactic information and treatment for sexually transmitted diseases, are given to victims of sexual abuse. Inmates who had previously made allegations of sexual abuse also confirmed that they had received medical and/or mental health treatment in a timely manner.

(D) Policy (#5002, #4300) notes that all victims of sexual abuse shall have access to forensic medical examinations at an outside facility without financial cost where evidentiary or medically appropriate. The service shall be provided to the alleged victim regardless of whether the victim names the alleged abuser or cooperates with any investigation arising out of the incident. In speaking with medical/mental health staff, adherence to this policy was confirmed. Additionally, inmates who had previously received medical treatment for allegations of sexual abuse confirmed that they were not charged a medical fee for said services.

Reasoning & Findings Statement:

This standard is designed to provide inmates access to emergency medical and mental health services. In this, facility staff are meeting all the provisions within this standard. Agency policy allows that upon receipt of an inmate into the Medical Department, medical staff shall determine the inmate’s course of treatment; specifically, what is medically indicated based on evidence collection or physical trauma. Inmate interviews further acknowledge that inmates are provided appropriate medical and mental health treatment. Lastly, documentation reflecting access to medical and mental health care, to include outside services, was reviewed. In reviewing the totality of the information provided, the CCNO has met the minimums provisions of this standard.

115.83

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

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO #4300, Medical/Mental Health Care Services for Inmates, 10-31-22

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Medical Staff
- Mental Health Staff
- Random Inmates
- SANE/SAFE Personnel of Parkview Bryan Hospital
- Williams County Victim Assistance
- The Center for Child and Family Advocacy

Site Review Observations:

- Observed Medical Department and privacy screens/limitations.
- Observed interview rooms and protocol for confidential interviews.
- Reviewed Williams County Victim Assistance Website
- Reviewed The Center for Child and Family Advocacy Website

Standard Subsections:

(A) Policy (#5002) requires that “the CCNO shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lock, or juvenile facility.” In speaking with medical/mental health staff, adherence to this policy was confirmed. In speaking with correctional staff, there were no instances where any staff indicated that the medical or mental health departments had ever, or would ever, refuse to provide medical or mental health treatment to any inmate who claimed to have been a victim of sexual abuse. In speaking with inmates who were receiving mental health treatment services, it was generally confirmed that upon making their allegations, they were automatically referred for a mental health evaluation.

(B) Policy (#5002) requires that “the evaluation and treatment of such victims shall 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.” In speaking with the CCNO PREA Compliance Manager, Medical/Mental Health Staff, as well as victim advocacy staff from the Williams County Victim Services and The Center for Child and Family Advocacy, it is more than evident that the CCNO offers continuing mental health and sexual assault advocacy services to inmates throughout their assignment to the CCNO and even upon their release from the agency.

(C) Policy (#5002) requires that all victims of sexual abuse shall 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. As noted by Medical/Mental Health staff, the medical, mental health, and advocacy services received within the CCNO is not only consistent with the community level of care, but arguably much better. As this care is coordinated to ensure that inmates receive every aspect of sexual abuse treatment, addressing both medical and mental health needs on a regular and timely basis, without regard to cost, the opportunity for treatment received in this institutional setting, it far exceeds that of individuals seeking similar services within the community.

(D) Policy (#5002) requires that “inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.” As noted by Medical/Mental Health staff, as well as SANE/SAFE staff at the local hospital and SART Clinic, adherence to this policy is strictly maintained.

(E) Policy (#5002) requires that if pregnancy results from sexually abusive vaginal penetration while incarcerated, “such victims shall receive timely and comprehensive information about the timely access to all lawful pregnancy-related medical services.” As noted by Medical/Mental Health staff, as well as SANE/SAFE staff at the local hospital and SART Clinic, adherence to this policy is strictly maintained.

(F) Policy (#5002) requires that when medically appropriate, “inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections.” As noted by Medical/Mental Health staff, as well as SANE/SAFE staff at the local hospital and SART Clinic, adherence to this policy is strictly maintained.

(G) Policy (#5002) notes that all victims of sexual abuse shall have access to forensic medical examinations at an outside facility without financial cost where evidentiary or medically appropriate. The service shall be provided to the alleged victim regardless of whether the victim names the alleged abuser or cooperates with any investigation arising out of the incident. As noted by Medical/Mental Health staff, as well as SANE/SAFE staff at the local hospital and SART Clinic, adherence to this policy is strictly maintained. Additionally, CCNO inmates who had previously received medical treatment for allegations of sexual abuse also confirmed that they were not charged a medical fee for said services.

(H) The CCNO is a jail facility. As such, this provision does not apply.

Reasoning & Findings Statement:

This standard is designed to ensure ongoing medical and mental health care for sexual abuse victims and abusers. The CCNO offers qualified and coordinated medical and mental health care regardless of an inmate’s ability to pay for said services. As appropriate, inmates are provided the opportunity to attend follow-up treatments, for both medical and mental health services. Once established, agency policy requires that access to said treatment follows the inmate throughout the CCNO system and can be coordinated with community care upon the inmate’s release from the CCNO. The medical and mental health services provided are consistent with the community level of care. Additionally, because this level of care is coordinated to ensure that inmates receive every aspect of sexual abuse treatment, addressing both medical and mental health needs on a regular and timely basis, without regard to cost and continuing after release, the opportunity for treatment received in this institutional setting far exceeds that of individuals seeking similar treatments within the community. Accordingly, the CCNO Medical and Mental Health Departments have

collectively satisfied the provisions of this standard.

115.86 Sexual abuse incident reviews

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO PREA Incident Review Meeting, 1-18-24a
- CCNO PREA Incident Review Meeting, 1-18-24b

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Incident Review Team Member

Site Review Observations:

- Reviewed Sexual Abuse Incident Review procedures.
- Review investigative case files with subsequent PREA Incident Review Meetings.

Standard Subsections:

(A) Policy (#5002) states that “the CCNO shall 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.” During the audit time frame, the CCNO received three (3) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the CCNO PREA Compliance Manager, the CCNO has engaged three (3) Sexual Abuse Review Team meetings. In speaking with the CCNO PREA Compliance Manager, the CCNO Warden, and the CCNO Institutional Investigator, each person explained their role within the incident review process.

(B) Policy (#5002) requires the CCNO to conduct sexual abuse incident reviews, unless determined to be unfounded, ordinarily within thirty (30) calendar days of the conclusion of investigation. During the audit time frame, the CCNO received three (3) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the CCNO PREA Compliance Manager, the CCNO has engaged three (3) PREA Incident Review Meetings. Documentation evidencing the practice of PREA Incident Review Meetings was reviewed to ensure timely compliance.

(C) Policy (#5002) requires that “the review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. The PREA Coordinator did affirm the proper personnel attended team meetings. As well, documentation was reviewed to ensure PREA Incident Review Meetings did contain the proper personnel mixture.

(D) Policy (#5002) requires that the PREA Incident Review Meetings shall consider:

- a. Whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- b. Whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;
- c. Whether the area in the facility where the incident allegedly occurred contains physical barriers in the area may enable abuse;
- d. The adequacy of staffing levels in that area during different shifts;
- e. Whether monitoring technology should be deployed or augmented to supplement supervision by staff.
- f. Following consideration, the PREA Compliance Manager shall document the

PREA Incident Review Meetings as a written report. In this, the determinations made within the meeting, as well as any recommendations for improvement will be noted prior to submitting the report to the Executive Director for review.

(E) Upon completion of the PREA Incident Review Meetings, the “CCNO shall implement the recommendations for improvement or shall document its reasons for not doing so” (#5002). In speaking with the CCNO Warden, the responsibilities of the managing officer to implement PREA Incident Review Meetings recommendations was explained.

Reasoning & Findings Statement:

During the audit time frame, the CCNO received three (3) sexual abuse allegations, excluding only unfounded incidents. As such, it was necessary to engage PREA Incident Review Meetings upon the conclusion of each investigation. A review of documentation reflects the timely convergence of those designated staff members. In speaking with the CCNO PREA Compliance Manager, the CCNO Warden, the CCNO Institutional Investigator, and the CCNO Executive Director, each person explained their role within the incident review process. As such, it is evident that the facility has procedures in place to engage incident reviews and that staff are knowledgeable in their obligations to the team. Accordingly, CCNO has satisfied the requirements of this standard.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none">· CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21· CCNO PREA Allegation Spreadsheet: March 1, 2023 to February 29, 2024· CCNO PREA Annual Report, 2023 <p>Interviews:</p>

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff

Site Review Observations:

- Review of agency website.
- Reviewed 2023 PREA Annual Report

Standard Subsections:

(A) Policy (#5002) provides all staff within the CCNO a standardized set of definitions specific to sexual abuse and sexual harassment allegations. Policy (#5002) further mandates that “the CCNO shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.” In speaking with the PREA Coordinator, adherence to this provision was confirmed.

(B) Policy (#5002) further requires that “the CCNO shall aggregate the incident-based sexual abuse data at least annually.” In speaking with the PREA Coordinator, adherence to this provision was confirmed.

(C) Policy (#5002) requires that “the incident-based data collected shall 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.” In speaking with the PREA Coordinator, adherence to this provision was confirmed.

(D) Policy (#5002) requires that “the CCNO shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigations files, and sexual abuse incident reviews.” In speaking with the PREA Coordinator,

	<p>adherence to this provision was confirmed.</p> <p>(E) The CCNO does not contract for the confinement of its inmates. As such, this provision does not apply.</p> <p>(F) Policy (#5002) requires that “upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30, or the deadline required by the Department of Justice. In speaking with the PREA Coordinator, adherence to this provision was confirmed.</p> <p>Reasoning & Findings Statement:</p> <p>This standard works to ensure that specific data relative to promoting sexual safety within a correctional institution is collected on a monthly basis. That data is then aggregated and made available for public review. The CCNO has complied with the timely collection of said data and subsequently furnishes it to appropriate entities upon request. Hence, the CCNO has met all provisional requirements and is in compliance with this standard.</p>
--	---

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ul style="list-style-type: none"> · CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 · CCNO PREA Allegation Spreadsheet: March 1, 2023 to February 29, 2024 · CCNO PREA Annual Report, 2023 <p>Interviews:</p> <ul style="list-style-type: none"> · Agency PREA Coordinator

- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff

Site Review Observations:

- Review of agency website.
- Reviewed 2023 PREA Annual Report

Standard Subsections:

(A) Policy (#5002) requires the CCNO to prepare and aggregate data related to sexual abuse and sexual harassment. Following which, the CCNO then uses that data to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training. Specifically, the CCNO works to identify problem areas, take corrective action on an ongoing basis, and prepares an annual report of its findings from the data review and any corrective actions for each facility, as well as the agency as a whole. The PREA Coordinator confirmed adherence to this policy. As well, the CCNO PREA Annual Report, 2023, does reflect the intelligent use to this data to inform facility needs.

(B) Policy (#5002) requires that annual statistical reports “shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the CCNO’s progress in addressing sexual misconduct.” The PREA Coordinator confirms adherence to this policy. As well, the CCNO PREA Annual Report, 2023, does reflect a comparative analysis across years.

(C) Policy (#5002) requires that upon completion of each year’s annual report, “the report shall be approved by the Executive Director and made readily available to the public through its website.” The PREA Coordinator confirms adherence to this policy. Furthermore, A review of the CCNO website demonstrates that the annual report is made available to the public. <https://www.ccnoregionaljail.org/VictimServices/ReportSexualAbuse>

(D) Policy (#5002) allows that the CCNO may redact information from the report due

to a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redaction. In speaking with the agency PREA Coordinator, it was noted that should the agency need to redact specific information other than publicly identifying statistics, proper procedural restraints would be applied.

Reasoning & Findings Statement:

This standard works to determine if agency uses aggregated data to promote the overall safety and security of the facility. In speaking with the PREA Coordinator, CCNO PREA Compliance Manager, the CCNO Warden, and the Executive Director, the manner in which person utilizes the data to improve overall institutional safety, based on their role within the agency, was explained. Hence, the CCNO has demonstrated clear compliance with each of the provisions, and as such, has reached the goal of the standard.

115.89	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ul style="list-style-type: none"> • CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21 <p>Interviews:</p> <ul style="list-style-type: none"> • Agency PREA Coordinator • PREA Compliance Manager • Facility Administrator • Intermediate or Higher-Level Facility Staff <p>Site Review Observations:</p>

- Review of agency website.

Standard Subsections:

(A) Policy (#5002) requires that “the CCNO shall ensure that data collected pursuant to section 115.87 are securely retained.” The PREA Coordinator confirms agency compliance with this directive.

(B) Policy (#5002) requires that the CCNO shall make all aggregated sexual abuse data readily available to the public at least annually through its website. The PREA Coordinator confirms agency compliance with this directive. As well, review of the agency website reflects the availability of annual data.

(C) Policy (#5002) requires all personal identifiers must be removed from publicly available data. The PREA Coordinator confirms agency compliance with this directive. As well, review of the data available on the agency website does not contain any personal identifiers.

(D) Policy (#5002) requires all aggregated data to be retained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise. The PREA Coordinator confirms agency compliance with this directive.

Reasoning & Findings Statement:

This standard works to ensure both public availability and agency integrity in the presentation of aggregated sexual abuse data. In reviewing agency documents and speaking with staff, it is apparent that the administrative staff of the CCNO operate with transparency in government. As such, the facility has clearly obtained each provision, and thus, satisfactorily achieve overall compliance.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Exceeds Standard

Auditor Discussion

Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO PREA Audit Report, 2021

Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Facility Administrator
- Intermediate or Higher-Level Facility Staff
- Random Staff
- Random Inmates

Site Review Observations:

- Onsite inspection of the entire CCNO.
- Review agency website.

Standard Subsections:

(A) As evidenced by presence of the previous facility audit (2021) on the CCNO website, and confirmed by the PREA Coordinator, PREA Audits are completed at CCNO once during each three-year period.

(B) This is Audit Year 2 of Cycle 4. The CCNO is a stand-alone jail. PREA Audits are completed at CCNO once during each three-year period.

(C) The auditor had full access to all areas of the facility and was able to view all inmate activities without undue delay.

(D) All documents requested by the auditor were received. In fact, the CCNO made every effort possible to not only provide the auditor with the documents requested, but also with any relevant documentation related to the initial request. And not only were these documents provided to the auditor, but they were also provided in the most expedient manner.

(E) The auditor was permitted to conduct private interviews with inmates.

(F) Inmates were permitted to correspond with the auditor using privileged mail processes.

Reasoning & Findings Statement:

Both the PREA Coordinator and the CCNO PREA Compliance Manager were exceptionally prepared for this review. The auditor was provided the PAQ well in advance of arriving to the facility. The auditor was given unrestricted access to the institution and provided with all reference materials requested. Specifically, the PREA Compliance Manager went to great lengths to ensure that all documentation requested, both during and subsequent the onsite portion of the audit, was provided as requested and in the most expediate manner! The auditor was provided with a convenient location from which to interview both employees and staff in a confidential manner. Agency staff ensured that the flow of interview traffic was never restricted and that the auditor was able to attend all requested inmate functions throughout the facility as needed. The auditor did not experience any significant barriers, at any stage of the audit, that were under the control of the CCNO. Accordingly, CCNO has exceeded the provisions of this standard.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents:

- CCNO #5002, Sexual Assault and Sexual Misconduct with Inmates, 4-20-21
- CCNO PREA Audit Report, 2021

Interviews:

- Agency Head
- Agency PREA Coordinator
- PREA Compliance Manager

Site Review Observations:

- Review the agency website.

Standard Subsections:

(F.)A review of the agency website reflects that the CCNO has published its final audit report for the previous cycle.

Reasoning & Findings Statement:

The function of this standard is to promote transparency in government by ensuring that all facility audits are available for public review, by way of, for example, the agency's website. In this case, the CCNO does have an agency website and has made its previous PREA report conveniently accessible to the public.

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
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 English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication	yes

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

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

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

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
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.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	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 inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

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

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d) Protective Custody		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

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

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

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

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

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

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

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

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

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

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

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

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

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

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes