

# PREA Facility Audit Report: Final

**Name of Facility:** Roanoke City Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 09/30/2020

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Ron L Kidwell	<b>Date of Signature:</b> 09/30/2020

AUDITOR INFORMATION	
<b>Auditor name:</b>	Kidwell, Ron
<b>Email:</b>	ronnie.kidwell@yahoo.com
<b>Start Date of On-Site Audit:</b>	08/05/2020
<b>End Date of On-Site Audit:</b>	08/07/2020

FACILITY INFORMATION	
<b>Facility name:</b>	Roanoke City Jail
<b>Facility physical address:</b>	324 Campbell Ave., Roanoke , Virginia - 24016
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	David Stultz
<b>Email Address:</b>	David.Stultz@roanokeva.gov
<b>Telephone Number:</b>	540-853-1760

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Tim Allen
<b>Email Address:</b>	sheriff@roanokeva.gov
<b>Telephone Number:</b>	540-853-1717

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

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Daphne Norman
<b>Email Address:</b>	dnorman@Wellpath.us
<b>Telephone Number:</b>	540-853-5611

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	834
<b>Current population of facility:</b>	379
<b>Average daily population for the past 12 months:</b>	546
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18-84 with average of 37 yoa
<b>Facility security levels/inmate custody levels:</b>	LowMin(Level-8) - Max (Level-1)
<b>Does the facility hold youthful inmates?</b>	Yes
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	200
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	34
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	62

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Roanoke City Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	340 Campbell Avenue SW , Roanoke , Virginia - 24016
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	David Stultz	<b>Email Address:</b>	david.stultz@roanokeva.gov

## AUDIT FINDINGS

### **Narrative:**

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

### Pre-Audit Phase

The Prison Rape Elimination Act (PREA) Audit of the Roanoke City Sheriff's Office Jail (RCSO) was conducted from March 30, 2020 to September 04, 2020. The RCSO requested a PREA audit be conducted by the PREA Auditors of America LLC. This certified PREA auditor, Ron Kidwell was contracted by the PREA Auditors of America on December 29, 2019, to conduct this scheduled PREA audit. The facility had been previously audited on July 19, 2017. On March 30, 2020, an introductory meeting was arranged to discuss several important topics. Those topics included the process needed to utilize the Online Audit System (OAS), posting the Audit Notice at least six weeks in advance, and an initial timeline for the audit. The meeting took place via phone call with a follow up email addressing the topics discussed. Present on the phone call was Master Deputy David Stultz (RCSO PREA Coordinator) and Ron Kidwell (PREA Auditor) for PREA Auditors of America. During this conversation I requested contact information for the PREA Coordinator and his immediate supervisor to begin the process of gaining access to the OAS. This request was also reiterated and documented in the e-mail that followed the phone conversation on the above listed date.

Also, on March 30, 2020 copies of the PREA AUDIT Notice in both English and Spanish languages were sent to the PREA Coordinator via e-mail. The PREA notice communicates to staff and inmates that the facility will be undergoing an audit for compliance with DOJ standards to prevent, detect, and respond to prison rape. The notice identifies the onsite dates of the audit and provides a confidential way to communicate with the auditor through the auditor's personal contact information. The notice also spells out how the confidential information is to be handled and when the confidential information must be reported. In addition, the email provided specific instructions to post the notices at least six weeks in advance of the scheduled onsite phase and that the audit notices needed to be posted throughout the facility in places where it would be visible to all inmates and staff (e.g., visiting areas, housing units, and recreational spaces). Also, that the correspondences between the inmates and auditor needed to be treated as legal mail and to confirm that the notices were posted in the appropriate time frame by date stamped photographs of the posters throughout the facility. On April 06, 2020, the PREA Coordinator sent me date stamped photographs of posted PREA Audit Notices from the facility. The original PREA audit on-site dates for this audit were set for June 3-5, 2020.

On March 31, 2020, the auditor received a request from the OAS tech support requesting further information on if there is a PREA Compliance Manager for the RCSO. This auditor immediately responded that there was no Compliance Manager and only a PREA Coordinator. After a six-day period of no advancement, the auditor contacted the RCSO PREA Coordinator to see if there were any issues that needed to be worked through. The PREA Coordinator informed the auditor that he was granted access to the OAS on 04/06/2020 and that he had begun working on the PREA Audit Questionnaire.

On April 21, 2020, the PREA auditor received a notification from the PREA Resource Center indicating that the Pre-Audit Questionnaire had been submitted by the RCSO and ready for review.

On April 24, 2020, the Auditor sent the PREA Coordinator an email requesting information and documentation that was needed. The information requested was to provide contact information on local advocacy groups, to agree on a date the Pre-Audit Questionnaire would be completed, request office space with internet access, permissible personal tech items (i.e. laptop, cellphone), a diagram of the facility, and the names of all the inmates that alleged sexual abuse or sexual harassment in the last twelve months. The list consisted of 19 allegations. The Auditor received all the requested information by close of business the following day.

On May 5, 2020, the PREA auditor contacted Just Detention asking if their organization had any information about sexual safety at the RCSO facility, especially any information related to reported cases of sexual abuse or sexual harassment. Just Detention advised the auditor that they had not received any information related to sexual safety from any individual associated with the RCSO.

On May 12, 2020, the PREA auditor consulted with the PREA Resource staff about postponing the upcoming audit due to the COVID-19 epidemic. I was seeking guidance on what the current protocol was for conducting audits during the pandemic and what steps needed to be taken to ensure the safety of everyone involved. I was also seeking information on the postponement procedure and how to make the process as smooth and manageable as possible if the auditor chose to delay the on-site phase. The auditor then reached out to the auditing agency (Roanoke City Sheriff's Office) and requested to reschedule the on-site phase of the PREA audit. The Roanoke City Sheriff's Office accommodated the request with a couple of conditions. The auditor would make all necessary arrangements for the postponement and confirm that in no way would the Roanoke City Sheriff's Office be penalized in any way due to the rescheduling of the on-site phase of this audit. The auditor made all necessary arrangements to postpone the audit until August 5-7, 2020, in the hopes that the COVID-19 pandemic would subside.

The PREA auditor completed the review of all the documentation that was provided by the RCSO staff in the Pre-audit Questionnaire. The documentation is supposed to help support how a facility is establishing a baseline for its actual practice for zero tolerance for sexual abuse and sexual harassment. The auditor identified gaps or issues that needed to be followed up on and in some cases requested additional information. The request was captured on an easy to review document called an Issue Log. The Log is used to outline requests for response to questions that need to be clarified during the audit process. The auditor submitted his Issue Log to the RCSO on May 15, 2020, containing sixteen requests for additional information.

On May 18, 2020, the PREA auditor revised the PREA Audit Notices both in English and Spanish with the new on-site audit date and sent them to the PREA Coordinator via e-mail. The auditor requested that the PREA Coordinator post the new notices in place of the old notices throughout the facility. The PREA Coordinator replaced the notices and provided proof that the request had been completed.

During the review phase of the Pre-Audit Questionnaire the auditor noticed that the standing MOU indicating who conducted criminal investigations was all-encompassing and nonspecific. Though, the MOU between the Roanoke City Sheriff's Office and the Roanoke City Police Department did specify that the Roanoke City P.D. has jurisdiction on all criminal activity that occurs in the Roanoke City Jail. The auditor did recommend that the RCSO amend the current memorandum of agreement to be more PREA specific.

On June 17, 2020, the auditor contacted the Roanoke City Police Department; Crimes Against Persons Division to establish if they did in fact conduct alleged sexual assault criminal investigations at the RCSO

facility. The auditor scheduled a phone call with the Supervisor of the Sex Crimes Unit. He informed me that they do in fact investigate all criminal sexual assault allegations and acknowledged that the only requirement needed to send an investigator is an official request from the RSCO facility.

On July 6, 2020 multiple emails were sent to the PREA Coordinator of the RSCO facility requesting lists for the interview selection and lists for document sampling. The lists consisted of individuals with specific responsibilities as it relates to PREA and individuals who have the authority to change policy. The list included individuals such as the Agency Head, Superintendent, PREA Coordinator, PREA Investigators, Medical staff and more. Also included was a request for a complete staff roster, lists of contractors and volunteers that had contact with inmates, inmates that have reported sexual victimization during risk screening, LGBTQ inmates, inmates with disabilities, inmates who are limited English proficient, inmates who reported sexual abuse, and more. Finally, the auditor requested all investigations related to sexual abuse or sexual harassment over the last twelve months. When sampling documentation the auditor is reviewing files in three separate categories. There are Employee files, Inmate files, and Investigative files. The auditor provided the RSCO with a list of specific files in each category to be reviewed.

On July 23, 2020, the PREA auditor conducted a Sexual Assault Nurse Examiner (SANE) interview by phone with a SANE Nurse from the Carillon Roanoke Memorial Hospital, located in Roanoke, Virginia. A SANE nurse is a highly skilled certified nurse trained in the art of evidence collection and chain of custody. The nurse is considered the subject matter expert in collecting evidence after an alleged sexual assault has occurred. The nurse is also required to provide testimony in court cases related to sexual abuse. The Nurse explained that she was aware of the MOA between the RCPD and the RSCO jail when it comes to conducting SANE exams. She explained that Carillon Hospital provides forensic medical examinations for most of the surrounding jurisdictions. When asked if the Carillon Hospital Forensics Unit is responsible for conducting all forensic medical exams for the RSCO facility, the SANE Nurse stated, "Yes, they are." When asked who assumes responsibility if SANE staff are unavailable to conduct forensic medical examinations? The Nurse replied that her staff is available 24 hours a day, 7 days a week, and 365 days a year. However, in the event a SANE Nurse is unavailable the individual would be transferred to the nearest hospital that conducts SANE exams.

On July 24, 2020, the PREA auditor contacted the victim advocacy group that the RSCO facility has a contractual MOU with. The Sexual Assault Resource and Awareness Agency (SARA) located in Roanoke, Virginia serves the residents of the Roanoke Valley. The Valley is comprised of the independent cities of Roanoke and Salem, Botetourt, Craig, Franklin, and Roanoke counties. SARA provides a twenty-four-hour crisis hotline, emergency room advocacy, trauma-informed therapy, shelter, supportive counseling, and legal advocacy. During a phone interview the Director acknowledged the services offered to the RSCO facility. She informed me that the center provides a toll free twenty-four hour seven days a week hotline service, victim advocacy, and counseling to those who request it. She also stated that the advocate would be able to be present at all medical forensic examinations and witness interviews if requested by the victim. SARA does not report any allegations of sexual abuse made by inmates to anyone without permission from the inmate, therefore, SARA is not considered an outside reporting entity. The Director stated that her agency has not received any allegations of sexual abuse or sexual harassment from any inmate or staff associated with the RSCO within the last twelve months. The auditor also reviewed the RSCO website, reviewed the mandatory reporting laws, and performed an internet research on the RSCO. However, nothing of relevance related to the safety or prevention of sexual abuse was found.

On July 27, 2020, the PREA Coordinator provided the PREA auditor with a list of both volunteers and contractors that participate and work at the RSCO county jail. The list contained personal contact

information for these individuals so that the PREA auditor could conduct phone interviews prior to the on-site audit. This was necessary due to the COVID-19 pandemic. The Roanoke City Sheriff established a standing order that denied access to all visitors, volunteers, and non-essential contractors to the county jail, in an attempt to lessen the spread of the virus and protect all staff and inmates. Therefore, the PREA auditor conducted those specialized staff interviews by phone, prior to the on-site audit phase.

On July 29, 2020, the PREA auditor arranged a call with the RCSO PREA Coordinator. The call was to codify the logistics of scheduling interviews with specialized staff, contractors, volunteers, inmates, and staff on different work rotations. We also discussed the Issue Log and what specifically the auditor was looking for as proof of documentation or policy. All requested lists and documentation have been provided to the PREA auditor prior to the beginning of the onsite phase of this PREA audit.

At this time, the PREA auditor has not received any confidential communication (mail) from the incarcerated inmates housed at the RCSO facility. This would also include any staff members employed at the Roanoke City jail wishing to discuss any PREA related issues with this auditor. The confidential mail would be the product of the PREA Audit Notice postings throughout the RCSO facility.

#### On-Site Audit Phase

On 08/05/2020, at approximately 0830 hours a PREA audit kickoff meeting was conducted. The meeting was scaled down due to Coronavirus concerns. Present at the meeting were 5 staff members: Agency staff leadership, medical/mental health director and the PREA Coordinator. The meeting was designed to place names with faces and to create a positive working relationship to prepare for the next three days. After the conclusion of the meeting the auditor began the facility observation tour. Accompanied by both the PREA Coordinator and Chief Deputy, the tour covered the entire facility over the next 3 hours. During the on-site tour, the auditor observed the Chief Deputy make multiple cross gender announcements prior to entering female housing units. The auditor also observed the intake area and received an overview of the classification / PREA screening process. The intake process is configured by way of the police officer driving into a secure sally-port and escorting the prisoner to a Magistrate's office located within the jail. If the prisoner is committed to jail, the inmate is taken before the booking officer and is asked multiple questions to include questions about the inmate's mental health and sexual safety. At the conclusion of the booking process, the inmate is given a document the size of a business card that explains the agency's zero tolerance policy and the ways an inmate can report a sexual abuse or sexual harassment allegation. These cards are provided in both English and Spanish. Within a twenty-four-hour period, all inmates are classified by the classification section. This process is conducted with a classification deputy who reviews prior criminal history, prior incarceration records, current charges, and many other factors before assigning a housing unit. It is during this process that the classification deputy conducts a risk screening evaluation for sexual safety. The RCSO's risk screening assessment consists of 11 potential victims 'yes or no questions' and 9 potential aggressors 'yes or no questions.' Each question that is answered by a yes has a number value associated with it. If the yes answers reach a certain number amount, then that person could be either classified as a potential victim or aggressor. There is no subjectivity to this assessment.

The auditor observed the three separate control centers, cafeteria, visiting area, infirmary, every housing unit, and private offices. During this tour, the auditor looked at camera placement for possible blind spots and the inmate to officer ratio. Also considered was the supervision to deputy ratio. It is this auditor's perception that the RCSO had adequate supervision assigned to the confinement areas to prevent, detect, and respond to sexual misconduct incidents. The auditor looked at privacy issues, how the toilet and shower areas were configured, and if the inmates had adequate privacy. Also, if staff of the opposite gender announce their presents when entering a housing unit of the opposite sex. The auditor



documented if PREA posters and PREA audit notices were displayed in the housing units and public areas as well. The auditor noted the number of phones in each unit and if the advocacy hotline number along with the outside reporting entity contact information was readily available in the housing units. The auditor asked an inmate to sign onto an issued tablet so that the auditor could send a confidential test message to see if the message would be acknowledged in a timely manner. The auditor also conducted a test call to the outside entity to prove the effectiveness of the facility's practice. And the auditor spoke to multiple inmates about if they knew how to report an allegation of sexual abuse. Finally, the auditor spoke to medical and mental health staff about their duty to report and their sexual safety inside the jail. The medical and mental health staff is comprised of an employee workforce that provides their services through a contractual service provider. The mental health staff is stationed inside the facility and made available by referral and during normal business operations.

On 08/05/2020, at approximately 1150 hours the PREA auditor began the interviewing process. For the rest of the evening the auditor completed thirteen specialized staff interviews. This process continued over the next 2 days until 08/07/2020. Over that 3-day period the auditor conducted 57 interviews with staff and inmates. This included the agency leadership, which consisted of the Sheriff, Chief Deputy, Commander of Operations, PREA Coordinator, Health Services Administrator, and the Supervisor of Sex Crimes for the Roanoke P.D. In addition, the auditor interviewed 19 specialized staff. Listed below is the sample of specialized staff that was interviewed:

- Ø Agency Head / Sheriff
- Ø Warden / Chief Deputy Sheriff
- Ø PREA Coordinator
- Ø Intake Officer
- Ø Non -Medical staff conducting strip searches
- Ø Intermediate – Higher level staff
- Ø Medical Staff
- Ø Staff performing risk screening
- Ø Human Resources Staff
- Ø Agency Contract Administrator
- Ø Volunteer
- Ø Contractor
- Ø First Responder
- Ø Investigative Staff
- Ø Staff member monitoring retaliation
- Ø Incident Review Team member
- Ø Rape Crisis Center Advocate Director

Ø Staff supervising inmates in segregated housing

Ø SANE Nurse

The selection of specialized staff also included several individuals who held multiple roles and responsibilities covered by the protocols. For example, the PREA Coordinator is responsible for monitoring retaliation and part of the Incident Review Team.

During the interview process 12 random staff were interviewed. The staff were randomly selected by the PREA auditor. The auditor chose staff from all shifts, working different assignments, and with different levels of experience. The auditor also made sure interviews were conducted with a proportionate amount of female staff corresponding to the RCSO's employee demographics.

The RCSO provided the auditor a list of 83 volunteers and 16 contractors that have contact with inmates. However, due to the Coronavirus epidemic, the Sheriff of Roanoke City limited access to the jail and stopped all volunteers from entering the jail at this time and in the near future. The directive was put in place to limit the possibility of spreading the virus among staff and inmates. Therefore, the auditor conducted phone interviews prior to the on-site audit phase. Four volunteer interviews were conducted.

During this audit 13 random inmates were chosen to be interviewed. At the time of this audit there were approximately 382 inmates housed at this facility. The auditor chose the names at random by going down the inmate roster by housing location. Age, institutional experience, and housing assignments were taken into consideration when making these selections.

Lastly, the RCSO provided the auditor with approximately 48 possible targeted inmates currently being housed in the facility. Of those 48 identified, 14 reported sexual victimization during the risk screening process, 2 reported sexual abuse, 3 LGB, 1 transgender, 8 physically disabled, 4 inmates that were limited English proficient, and 20 with a cognitive disability. The RCSO has not housed a youthful offender in the last twelve-months and reported no inmates housed in segregation for high risk and no inmates that were blind or deaf. During the pre-audit and on-site audit phases, the auditor had not discovered any evidence to the contrary that would suggest these statements by the RCSO about their targeted inmate population are inaccurate. Therefore, the Auditor had to adjust accordingly and selected additional targeted inmates from other categories. During the three-day audit 13 targeted inmates were interviewed covering 13 protocols. The targeted interviews are categorized by the following:

Ø 1 Physically disabled

Ø 2 Limited English Proficient

Ø 1 Cognitively disabled

Ø 1 LGB

Ø 1 Reported sexual abuse.

Ø 1 Transgender

Ø 6 Reported sexual victimization during risk screening

At the conclusion of the second day of the audit the auditor would still have 5 interviews to conduct and the review of all the documentation files. The auditor requested that the PREA Coordinator provide him with a predetermined list of investigations, inmate files, and staff personnel files selected by the auditor

for the following day. The PREA Coordinator arranged the requested files for review for the Auditor.

The PREA auditor reviewed a total of 30 files. Those files consisted of 10 inmate files, 10 staff personnel files, and 10 investigative files. The inmate files consisted of those inmates that had been previously interviewed during the audit that reported sexual abuse along with others that had been identified as possible targeted inmates. The staff personnel files were selected by random and several files were selected because staff members had been identified in investigations alleging sexual abuse and sexual harassment.

The personnel files consisted of pre-hire information, training records, and criminal history background documentation that the background check had been conducted. The inmate file consisted of the classification information, risk screening assessment, booking card, and any disciplinary proceedings. Finally, the investigative file contained all generated agency reports, documentation of evidence collected, and the completed administrative investigative report.

Of the 10 investigative files reviewed the following information was extracted. There were 4 investigations involving staff on inmate allegations and 6 investigations involving inmate on inmate allegations. There were 6 sexual abuse allegations, and 3 allegations of sexual harassment, with 1 case involving voyeurism. When classifying the final dispositions there were 2 investigations that were unsubstantiated, 7 unfounded, and 1 that was substantiated. Lastly, the Roanoke City Police was not contacted over the last twelve-month period.

## AUDIT FINDINGS

### Facility Characteristics:

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

### Facility Characteristics

The Roanoke City Jail is in downtown Roanoke, Virginia adjacent to the city courthouse. Roanoke City is the ninth largest city in the state of Virginia with an approximate population of 96,714 and is forty-three square miles. The agency is run by a duly elected Sheriff that must run for re-election every four years. The current Sheriff has been in office since 2013. The current Roanoke City Jail was opened in June 1979, replacing the previous jail that was constructed in 1915. In 1996 an addition was constructed to the existing jail structure that is referred to as the Annex. This expansion created an additional 331 bed design. The Annex also added a new library, new laundry facility, additional outdoor and indoor recreational areas, work release dormitory, segregation unit, program space, and an additional control room.

This facility is separated into 4 vertical floors and a second wing named the Annex. The housing areas are referred to as the First floor, Second floor, Third floor, Fourth Floor, First floor Annex and Second floor Annex. The jail is one large building made up of 38 housing units. The jail's inmate population capacity is 834 inmates with 126 sworn staff and 16 civilian jail staff. The daily population on the first day of this audit was 382 inmates. The RCSO jail currently houses minimum, medium, and maximum custody levels.

#### First-Floor:

Consists of the Sally Port entrance, Main Control, Magistrate Office, Receiving and Intake, Food Service Kitchen, Classification Office, Medical exam room, and 23 single cells with 1 multiple occupancy cell.

#### Booking:

Temporary housing area is a single cell housing unit consisting of 23 single cells and 1 multiple occupancy cell. The PREA information was posted next to the Booking Desk. There is a Body Scanner located in the Intake area situated in a private area behind the Booking desk. This scanner is operated by trained personnel certified in the use of this equipment. Everyone that is committed to the jail will be body scanned. The strip search area is a bathroom with a shower area. All strip searches are conducted by a deputy of the matching gender. During the tour, the auditor observed that all single housing cells have a metal hinged window cover door that can be open and closed to provide a level of privacy for the inmate. The initial PREA information is provided to the inmates by way of a business card that explains the ways to report a sexual abuse or sexual harassment allegation, the RCSO's zero-tolerance policy, and the definition of sexual assault. This card is stapled to the inmates' access code to make phone calls. The RCSO has the business cards in both English and Spanish versions.

#### Main Control

This control center is operated by two deputies and manages the ingress and egress of authorized personnel to and from the Sally Port to the Magistrates Office and into the Intake/Receiving area of the

City jail. The control center also monitors the First, Second, Third, and Fourth inmate housing floors of the original jail. The Main Control Center monitors 227 cameras throughout the facility with video recording capabilities. The monitors have “black out boxes” prohibiting staff from viewing the toilet and shower areas while observing the cameras. The control center has a portable radio system with the additional design function called a “man down system.” This system sounds an alarm when the portable radio is tilted in a fashion that would emulate when a deputy has fallen to the ground. This system can also be activated manually in cases of emergency. This system is designed to alert other deputies that are in the nearby vicinity to respond to a deputy in need of assistance. During the on-site tour, the Auditor observed the camera coverage in the main control center. Camera coverage maintains good visibility throughout the Jail.

#### Medical Exam Room

The medical exam room is in the Intake area and is utilized to screen initial pre-trial detainees. It is a single exam room with a nurse’s station inside the room. The room is equipped with an emergency button located next to the door that sounds an audible alarm throughout the Intake/Receiving area. The auditor spoke to the nurse about safety and she commented that she felt safe and that she is also issued a radio equipped with the “man down system.”

#### Food Service / Kitchen:

The RCSO jail kitchen has an open bay concept with two walk-in coolers and two walk-in freezers. These refrigeration coolers can only be accessed from the front. At the back of the kitchen you can enter a dry goods storage area. The dish room is located inside the kitchen area stationed on an outside wall, but in clear view of everything within the kitchen area. Also located in the kitchen is the civilian contractor staff’s office. A tool room is situated inside the contractor’s office and the tools are caged off and secure. There is camera coverage throughout the kitchen area and approximately 9 trustee inmates working at any given time. One contracted food service employee supervises these trustees.

#### Classification Office:

The Classification Office accommodated four classification deputies, each having their own personal workspace equipped with a desk. One deputy was specifically assigned to manage the mental health population. All classification records of all active inmates are stored in this office space. At no time is an inmate left alone in this office. All risk screening evaluations are located within the classification file.

#### Second-Floor

Consists of 8 separate housing units, A, B, C, D, E, F, G, and H. Blocks 2-G&H has toilets located inside the individual cells. Every Floor has its own dedicated non-contact visitation area. The auditor also reviewed the logbook noting that random checks were made by supervisors.

#### A, B Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house female inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. Announcements

were made prior to entering the block that male staff were present. The PREA auditor asked an inmate housed in the A Block to sign onto an issued tablet so that the auditor could send a confidential test message to see if the message would be acknowledged in a timely manner.

C, D, Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house female inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. Announcements were made prior to entering the block that male staff were present.

E, F Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house female inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. Announcements were made prior to entering the block that male staff were present. During the on-site tour, the PREA auditor had a general discussion with several female inmates housed in F-Block about how they would report a sexual abuse allegation. The inmates collaboratively identified 3 different ways to report. Those were by phone, verbally, and tablet.

G, H Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house female inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. Announcements were made prior to entering the block that male staff were present. G block was completely empty of any inmates.

Third – Floor

Consists of 8 separate housing units, A, B, C, D, E, F, G, and H. Every 2 housing blocks have 2 individual segregation cells located in the corridor outside the Blocks for a total of 8 isolation cells. Every Floor has its own dedicated non-contact visitation area. The auditor also reviewed the logbook notating that random checks were made by supervisors.

A, B Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell

housing pods. These blocks are assigned to house male inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### C, D Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house male trustee inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### E, F Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house male trustee inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 20 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. During the on-site tour, the PREA Auditor had a general discussion with one inmate trustee housed in E-Block about how he would report a sexual abuse allegation. The inmate stated that you could report either by notifying a deputy or calling the PREA hotline number that is in the inmate handbook.

#### G, H Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house male inmates struggling with mental health issues. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. In addition, H-Block is utilized as a "Crisis Pod." Therefore, 21 cameras and 2 monitors have been added to a deputy station inside the Block. There is a bank of 3 phones mounted on the perimeter wall along with a mobile rolling cart mounted phone. The block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. The G-Block is used for those inmates recovering from a mental episode and beginning to transition into a calmer and more relaxed environment. Therefore, these blocks are single bunked. Each block can house up to 10 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### Fourth - Floor

Consists of 8 separate housing units, A, B, C, D, E, F, G, H, and a Dispensary. They are all used as the maximum-security housing units for the jail. Every floor has its own dedicated non-contact visitation area. The entire fourth floor has toilets located in every cell.

#### A, B Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house maximum-security male inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 12 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. A Block was empty of any inmates during the tour.

#### C, D Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house maximum-security male inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 12 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### E, F Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house maximum-security male inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 12 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### G, H Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. These blocks are assigned to house maximum-security male inmates. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 12 inmates with three deputies roaming 8 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy. During the on-site tour, the PREA auditor used a telephone located in G – Block to call the PREA hotline/crime line to see if it was operational. The PREA auditor was prompted to dial 7732 to make a PREA complaint. The hotline was answered by the Roanoke Police Departments Records Section.

#### Health Services:

The Dispensary is located on the Fourth floor and consists of a waiting room, a dental office with a dental chair, examination room, nurse's station and 4 individual infirmary cells for those inmates in need of specialized medical treatment. The PREA information was posted as was the Audit Notice. There is a phone located in the common area of the infirmary dayroom. All inmates are escorted to and from the



infirmary by sworn staff.

#### First – Floor Annex

Consists of 7 separate housing units A, B, C, D, E, F, G, the Front Entrance, and the Annex Control Center.

#### Front Entrance:

The RCSO front entrance is an open concept waiting area with seating along the wall. There is a male and female restroom located in the vestibule. Located opposite the entrance doors is the Annex Control Center manned by two deputies equipped with secure windows to communicate with the public. The area has multiple messaging boards mounted on the walls. The PREA information, Audit Notice, and Third-Party reporting procedures were posted on these boards. There is a bank of kiosks that can be used by the public for video visitation and a dedicated visitor elevator that will bring the visiting public to the appropriate floor for a secure non-contact visit.

#### Annex Control Center:

The Annex Control Center is located on the First floor Annex. The center is manned by two deputies that monitor 112 cameras located throughout the Annex expansion, which encompasses both the First and Second floor Annex housing units. The cameras throughout the Annex has video recording capabilities. The monitors have “black out boxes” prohibiting staff from viewing the toilet and shower areas while observing the cameras. During the on-site tour, the Auditor observed the camera coverage in the Annex control center. Camera coverage maintains good visibility throughout the Annex.

#### First Floor Annex A, B, Block:

The housing units consisted of two adjacent identical housing blocks. They are multiple occupancy cell housing pods. Located in each cell are multiple bunks. These blocks are currently being used as a 14-day quarantine area for possible Covid-19 infections. All inmates that are remanded to the custody of the Sheriff must be quarantined for the first 14 days of their stay. If the inmates are negative of any symptoms, then they are moved into general population. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 30 inmates with three deputies roaming 6 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### First Floor Annex C, D, E, and F Blocks:

This wing consists of four separate housing blocks constructed in a horseshoe fashion. Both Blocks 1-C and 1-D are equipped with a skylight. They are multiple occupancy cell housing units. Located in each cell are multiple bunks. These blocks are currently being used as a 14-day quarantine area for possible Covid-19 infections. All inmates that are remanded to the custody of the Sheriff must be quarantined for the first 14 days of their stay. If the inmates are negative of any symptoms and then they are moved into general population. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible

alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 30 inmates with three deputies roaming 6 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### First Floor Annex 1G Block:

Is an open bay dorm style housing unit. The PREA information was posted as was the Audit Notice. Cameras are located inside the unit and a phone bank containing 3 phones are located on the outside wall. There is also an officer that roams between the units. This housing unit can house 48 inmates. This dormitory style housing was originally designed for a community work-force inmate population. However, this area is currently being utilized as a segregated quarantine area for those inmates that test positive for the Covid-19 virus.

#### Second – Floor Annex

Consists of 6 separate housing units I, J, K, L, M, N, Laundry Area, and Restrictive Housing Unit First.

#### Second Floor Annex 2 I, J Blocks:

This wing consists of two adjacent identical housing blocks. They are multiple occupancy cell housing units. Located in each cell are multiple bunks. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 30 inmates with three deputies roaming 6 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### Second Floor Annex 2 K, L, M, and N

This wing consists of four separate housing blocks constructed in a horseshoe fashion. Both Blocks 2-K and 2-L are equipped with a skylight. They are multiple occupancy cell housing units. Located in each cell are multiple bunks. The PREA information was posted as was the Audit Notice. There are multiple cameras mounted inside each housing unit. There is a bank of 3 phones mounted on the perimeter wall and the block is equipped with an emergency button located in the dayroom that sounds an audible alarm in the duty post office. A kiosk is also mounted on the wall for visitation. Each block can house up to 30 inmates with three deputies roaming 6 separate pods/blocks. Showers and toilets are enclosed with a shower curtain to provide privacy.

#### Second Floor Annex 2 S Segregation Block:

Is a single cell housing unit that is made up of 9 single housing cells. The PREA information was posted as was the Audit Notice. There are cameras located in the hallway. There are privacy factors that has been put in place to protect inmates from opposite gender viewing, which are hinged metal window covers that are attached to the door. The unit utilizes 1 phone on wall and a rolling phone is available if necessary. However, the PREA Coordinator stated that as long as there are no issues, the staff would allow one inmate at a time to come out of their cell and use the phone on the wall. The auditor also reviewed the logbook noting that random checks were made by supervisors. The shower area provides privacy with a shower door.

#### Laundry Area:

The Laundry room is located on the Second floor Annex and operated by eight trustees, supervised by

one deputy sheriff. The area is mostly closed off with one entrance and exit. All inmate uniforms are stored in a caged off secure area along with a single restroom within the laundry room. There is no camera coverage inside the laundry room but there is officer supervision. The auditor asked the trustee working if he knew how to report a sexual assault. The trustee stated that he could verbally report to anyone or write a confidential message on the tablet. The trustee also recalled watching the PREA video during his classification interview. This area is located on the First – Floor Annex.

**Personal Visiting Area:**

The personal visiting areas are a non-contact window viewing concept. The visitation area is in a centralized area on every inmate housing floor of the facility where it can easily funnel inmates to the area. The PREA information and Audit Notice was posted on the visitor side of the visitation area. Inmates housed at the RCSO can also have a video visitation either by utilizing the kiosks located inside the block or the issued tablet.

**AUDIT FINDINGS**

**Summary of Audit Findings:**  
The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy ). 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.

<b>Number of standards exceeded:</b>	0
<b>Number of standards met:</b>	45
<b>Number of standards not met:</b>	0

After reviewing all information provided during the pre-audit and onsite audit, including staff and inmate interviews, the auditor has determined the following for the Roanoke City Sheriff's Office:

Number of standards exceeded: 0

Number of standards met: 43

Number of standards not met: 0

Number of standards not applicable: 2

115.11 Meets Standard

115.12 Not Applicable

115.13 Meets Standard

115.14 Meets Standard

115.15 Meets Standard

115.16 Meets Standard

115.17 Meets Standard

115.18 Meets Standard

115.21 Meets Standard

115.22 Meets Standard

115.31 Meets Standard

115.32 Meets Standard  
115.33 Meets Standard  
115.34 Meets Standard  
115.35 Meets Standard  
115.41 Meets Standard  
115.42 Meets Standard  
115.43 Meets Standard  
115.51 Meets Standard  
115.52 Meets Standard  
115.53 Meets Standard  
115.54 Meets Standard  
115.61 Meets Standard  
115.62 Meets Standard  
115.63 Meets Standard  
115.64 Meets Standard  
115.65 Meets Standard  
115.66 Not Applicable  
115.67 Meets Standard  
115.68 Meets Standard  
115.71 Meets Standard  
115.72 Meets Standard  
115.73 Meets Standard  
115.76 Meets Standard  
115.77 Meets Standard  
115.78 Meets Standard  
115.81 Meets Standard  
115.82 Meets Standard  
115.83 Meets Standard

115.86 Meets Standard

115.87 Meets Standard

115.88 Meets Standard

115.89 Meets Standard

115.401 Meets Standard

115.403 Meets Standard

This audit did not require a corrective action period.

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or 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.

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RSCO Agency Pre-Audit Questionnaire</li> <li>b) RSCO Sheriff's Operating Instructions (SOI) Prison Elimination Act 3.33 Chapter 3 (Jail-General) Pages 1-5, states; that the RSCO written policy mandates a zero-tolerance policy toward all forms of sexual abuse and sexual harassment.</li> <li>c) RSCO Organizational Chart</li> <li>d) RSCO SOI 3.01 Chapter 3, (General Duties) Page 10</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>1. Specialized Staff (PREA Coordinator)</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.11 Provision (a)</p> <p>The agency has provided a written policy (RSCO SOI 3.33) that states that the RSCO mandates a zero-tolerance policy toward all forms of sexual abuse and sexual harassment. This policy also outlines how it will implement the RSCO's approach to preventing, detecting, and responding to sexual abuse and sexual harassment, such as; employing a PREA Coordinator with enough time and authority to oversee the jails efforts to comply with PREA standards. To make best efforts to comply with agency staffing plan and to have supervisors conduct unannounced rounds among many other strategies. In addition, the definitions associated with prohibited behaviors are also present in this agency policy. For example, the definition of sexual abuse, sexual harassment, and voyeurism. The policy also addresses sanctions for those who violate the PREA policy with discipline up to and including termination. Finally, the RSCO PREA Policy in its entirety incorporates the necessary fundamentals needed to describe RSCO's approach to detecting, preventing, and responding to allegations of sexual abuse and sexual harassment.</p> <p>The evidence collected for this provision shows that the agency has a written policy mandating zero tolerance towards all forms of sexual abuse. The policy also outlines the agency's approach to detecting, preventing, and responding to sexual abuse. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.</p>	



#### 115.11 Provision (b)

The RCSO provided an organizational chart that I reviewed. I observed that the PREA Coordinator in the rank of Sergeant is subordinate to the supervisor of Professional Standards Unit that holds the rank of Lieutenant. The Lieutenant falls directly under the supervision and control of the Deputy Chief of the facility which holds the rank of Major. Thus, providing upper level management positions to develop and implement oversight for the facility's compliance with PREA standards.

An interview was conducted with the RCSO's PREA Coordinator and the coordinator was asked whether he felt like he had enough time to manage all his PREA related responsibilities. The PREA Coordinator stated that he did have sufficient time and that the facility was more than accommodating to his needs and time to coordinate PREA related standards. He further stated that he coordinates the effort to comply with PREA standards by reviewing all intake screening, ensuring the appropriate training takes place, and monitors the standards for any changes or modifications.

The evidence collected for this provision shows that the agency has demonstrated that they employ an upper level PREA Coordinator with enough time and authority to develop, implement, and oversee agency efforts to comply with PREA standards. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.11 Provision (c)

The RCSO is a City Jail and only operates a single facility. Therefore, the need does not necessitate a PREA Compliance Manager thus the provision is not applicable.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have a written policy mandating zero tolerance towards all forms of sexual abuse and sexual harassment and to employ an agency PREA Coordinator.

<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Ø Chief Deputy Memo dated 07/20/2020 referencing standard 115.12 Provision (a)</p> <p>The Chief Deputy’s memorandum states that:</p> <p>The purpose of this communication is to document that the Roanoke City Jail does not currently have an agreement to contract with any other detention facilities to house its inmates. Additionally, the jail has not engaged in an agreement or contract of this nature within the past twelve months. Therefore, this standard is not applicable to this facility.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard because the standard is not applicable to this agency.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents</p> <ul style="list-style-type: none"> <li>a) RCSO SOI Policy 2.16, Chapter 2, Staffing Requirements</li> <li>b) RCSO SOI Policy 3.26, Chapter 3, Security Rounds pages 1,3, &amp;4</li> <li>c) Assistant Chief Deputy Memo dated 10/2/2019, 07/09/2019, 04/04/2019, 01/02/2020 and 04/02/2020. (Staffing Requirements)</li> <li>d) Agency PREA Coordinator Memo dated 04/08/2020 (Yearly Evaluation of Facility Staffing)</li> <li>e) Chief Deputy Memo dated 12/20/2019 (Evaluation of Facility Staffing Requirements)</li> <li>f) 2020 Duty Post Log entries from Daywork and Nightshift</li> </ul> <p>Interviews</p> <ul style="list-style-type: none"> <li>1. Interview with Warden or designee</li> <li>2. Interview with PREA Coordinator</li> <li>3. Interview with Intermediate or higher-level Facility Staff</li> </ul> <p>115.13 Provision (a)</p> <p>RCSO SOI Policy 2.16 states the agency shall ensure that the facility develops, documents, and makes its best effort to comply on a regular basis with a staffing plan as found in policy SOI 2.16 pages 3 and 4 that provides for adequate levels of staffing, and where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring the facility shall take into consideration:</p> <ul style="list-style-type: none"> <li>a) Generally accepted detention and correctional practices.</li> <li>b) Any judicial findings of inadequacy.</li> <li>c) Any findings of inadequacy from Federal investigative agencies.</li> <li>d) Any findings of inadequacy from internal or external oversight bodies.</li> <li>e) All components of the facility's physical plant (including blind spots).</li> <li>f) The composition of inmate population.</li> <li>g) The number and placement of supervisory staff.</li> </ul>

- h) Institution programs occurring on a particular shift.
- i) Any applicable State or local laws, regulations, or standards.
- j) The prevalence of substantiated incidents of sexual abuse; and
- k) Any other relevant factors.

Since the last PREA audit, the average daily population of inmates at the RCSO was 535 and the current staffing plan was predicated on 800 inmates housed at the RCSO.

During the interview with the Warden / Designee he was asked if the facility had a staffing plan and if the staffing levels to protect inmates from sexual abuse was considered in the plan. Also, if video monitoring is part of this plan and if the staffing plan is documented. The Warden/Designee confirmed yes to all the above questions. The Warden/Designee also confirmed that when reviewing the staffing plan on an annual basis that they consider all the above matters. Finally, the Warden/Designee explained that if the daily staffing plan is not met then overtime is used to backfill positions. In addition, the Warden/Designee stated that he is aware of staffing levels because he approves pay roll and receives a daily roster. The auditor also interviewed the PREA Coordinator and asked if the above considerations are weighed when developing the staffing plan. The Coordinator explained that they were considered. The staffing plan is developed on 38 security posts and 3 supervisors. The PREA Coordinator and Sheriff also advised that the facility added additional camera coverage during the Annex renovations at the jail. Most recently the Sheriff stated that he ordered additional camera coverage in the secure corridor that leads to the city courthouse. The RCSO also looks at surrounding jurisdictions lawsuits.

During the on-site tour, this auditor observed and documented the staff to inmate ratio in each housing block and the number of supervisors' present working alongside staff. This information is found in the facility characteristic portion of this audit report.

The evidence collected for this provision shows that the agency has a written policy that addresses appropriate staffing plans and reviews. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.13 Provision (b)

RCSO SOI Policy 2.16 page 1 documents that when the staffing plan is not met, these situations must be documented and justified. During the interview with the Warden/Designee he was asked if the agency documents all instances of non-compliance with the staffing plan. The Warden/Designee stated that "Yes, it is documented and the explanation for not meeting the plan must be justified."

The evidence collected for this provision shows that the agency has a written policy that addresses documenting situations where staffing plans are not met. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

Provision C:

RCSO SOI Policy 2.16 page 1 states that; Whenever necessary, but no less frequently than once each year, in consultation with the PREA Coordinator, the agency shall assess, determine, and document whether adjustments are needed to:

- The staffing plans.
- The deployment of video monitoring system and other monitoring technology; and
- The resources the facility has available to commit to ensure adherence to the staffing plan.

During the PREA Coordinator interview the coordinator was asked if he is consulted regarding any assessments or adjustments to the staffing plan. The Coordinator stated that the staffing plan is reviewed yearly and that the PREA Coordinator takes part in those meetings. The RCSO also provided meeting notes from the last three annual Staffing Plan Reviews.

The evidence collected for this provision shows that the agency has a written policy that addresses performing annual staffing plan reviews. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

115.13 Provision (d)

RCSO SOI Policy 3.16, page 3, paragraph section (Supervisor Rounds) state that supervisors will conduct unannounced rounds on a daily basis to deter staff sexual abuse. In addition, the policy states that staff is prohibited from alerting other staff members when these unannounced rounds are being conducted. Any violations would result in disciplinary actions. The RCSO provided 10 samples of Duty Post log pages identifying and documenting unannounced rounds by supervisors across all shifts at different times of the tour of duty. The auditor reviewed multiple duty post logs on all security posts during the site review tour confirming that these unannounced rounds are being conducted.

During the interview process, the auditor interviewed an intermediate or higher-level supervisory staff about unannounced rounds. The supervisor was asked if he conducted unannounced rounds and if he documented those rounds. The supervisor stated that yes, he performs unannounced rounds and that they are documented on the "Duty Post Log". When asked how the supervisor would prevent staff from alerting other staff members about unannounced rounds. The supervisor responded that he did them randomly, unannounced, and does not visit the floors in any order.

The evidence collected for this provision shows that the agency has a written policy that addresses performing unannounced rounds. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have supervision

and monitoring.

<b>115.14</b>	<b>Youthful inmates</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) Assistant Chief Deputy Memo dated on 08/07/2020 referencing standard 115.14 provision a, b, and c</li> <li>b) RCSO SOI Policy 3.05 Receiving and Admitting Inmates Chapter 3</li> <li>c) RCSO SOI Policy 2.32 Juvenile Operations</li> <li>d) 45 Inmate Population Reports</li> </ul> <p>Observations made during the On-site Audit and Document Review</p> <p>115.14 Provision (a)</p> <p>RCSO SOI Policy 3.05 Chapter 3, page 1 states in part that; “Inmates who are under the age of 18 who are considered to be juveniles by law will not be held at the jail.” Also, page 6 of the same policy states in part that; “male adjudicated offenders should be housed in cells in the Classification Holding Area separate from adults by sight and sound, until seen by Classification.</p> <p>In addition, RCSO SOI Policy 2.32 page 2 states in part that; “An adjudicated offender shall be placed in a housing unit in which they will not have sight, sound, or physical contact with any adult inmate through shared dayroom or other common space, shower area, or sleeping quarters.</p> <p>The RCSO PREA Coordinator provided 45 copies of inmate population reports to provide proof that the RCSO has not housed an adjudicated offender over the last 12 months and that it is against policy to house a juvenile at the Roanoke City Jail.</p> <p>115.14 Provision (b) &amp;(c)</p> <p>RCSO SOI Policy 2.32 Chapter 2 page 2 states in part that; “in areas outside of housing units, deputies shall:”</p> <ul style="list-style-type: none"> <li>a. Maintain sight and sound separation between adjudicated offenders and adult inmates, or</li> <li>b. Provide direct staff supervision when adjudicated offenders and adult inmates have sight, sound, or physical contact.</li> <li>c. Staff shall make best efforts to avoid placing adjudicated offenders in isolation to comply with PREA Standard 115.13. Absent exigent circumstances, deputies shall not deny adjudicated offenders daily large-muscle exercise and any legally required special education</li> </ul>	

services to comply with this provision. Adjudicated offenders shall also have access to other programs and work opportunities to the extent possible.

The Assistant Chief Deputy's memo dated 08/07/2020 states that "the RCSO does not house juvenile inmates and that they have not experienced a situation over the last 12 months where they housed an adjudicated offender.

During the on-site tour of the physical plant the Auditor did not witness any youthful inmates housed in the specified housing areas for adjudicated offenders. After conducting 57 interviews with staff and inmates there was no evidence to suggest that the RCSO houses youthful inmates. Also, no interviews were conducted for this standard because there have been no incidences involving adjudicated offenders in several years. Therefore, this standard is not applicable however, the agency does have policies and procedures in place to manage adjudicated offenders when these situations occur.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard.



115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO SOI Policy 2.15 Chapter 2 Searches for Contraband</li> <li>b) RCSO SOI Policy 3.05 Chapter 3 Receiving and Admitting Inmates</li> <li>c) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>d) RELIAS Cross Gender searches video</li> <li>e) 2018 &amp; 2019 Cross Gender Searches Training Rosters</li> <li>f) RCSO PREA Training Curricula</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 12 interviews with Random Staff</li> <li>b) 13 interviews with Random Inmates</li> <li>c) Interview with Non-medical staff involved with strip searches</li> </ul> <ul style="list-style-type: none"> <li>· Observations made during the On-Site Audit and Document Review</li> </ul> <p>115.15 Provision (a)</p> <p>RCSO is a metropolitan jail that houses both male and female inmates. RCSO SOI Policy 2.15, Chapter 2, page 3 states in part that; Roanoke City Sheriff’s Office staff shall not conduct cross-gender frisk, or pat-down searches on female inmates except for exigent circumstances. If cross-gender, frisk, pat down, or visual body cavity searches are conducted they must be documented. These circumstances shall not prohibit a female inmates’ access to regularly available programming or other out-of-cell opportunities. There are no examples of exigent circumstances in the last 12 months because it is against policy and no incidents have occurred. When conducting the on-site review of the facility the auditor observed adequate female staff to accommodate any day-to-day operations involving gender specific searches. When interviewing the non-medical staff responsible for conducting strip searches the deputy was asked under what circumstance would it require a cross-gender strip search. The deputy replied that he could not think of any circumstance that would constitute the need to cross-</p>

gender strip search on an inmate.

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances when performed by medical practitioners. The interview with non-medical staff that conducts strip searches confirmed the practice during the interview. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.15 Provision (b)

RCSO SOI Policy 2.15, Chapter 2, page 3 states in part that; Roanoke City Sheriff's Office staff shall not conduct cross-gender frisk, or pat-down, searches on female inmates, except for exigent circumstances. If cross-gender, frisk, pat down, or visual body cavity searches are conducted they must be documented. These circumstances shall not prohibit a female inmates' access to regularly available programming or other out-of-cell opportunities. There are no examples of exigent circumstances over the last 12 months because it's against policy and no incidents have occurred. When conducting the on-site review of the facility the auditor observed adequate female staff to accommodate any day to day operations involving gender specific pat searches.

During the on-site phase the auditor interviewed 12 random staff members from both day and night shifts. When asked, " If female staff are not available to search female inmates, does the jail limit those inmates' access to programs?" 11 deputies stated no that it had never occurred and the supervisory staff would ensure if the shift was short female deputies, then a female deputy would be called in to cover that shift. 1 deputy stated that he would have to search with another deputy present and document the search. In addition, 13 random inmates were interviewed during the on-site phase of the audit. Out of those 13 random inmates interviewed 5 of them were female. When asked by the auditor if they had ever been unable to participate in activities outside their cell because of the lack of female deputies to perform pat searches all 5 stated, "no."

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender pat searches, except in exigent circumstances when performed by medical practitioners. The interviews conducted with staff and female inmates confirmed there have not been incidents where female inmates have been limited to activities due to the shortage of female deputies. Therefore through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.15 Provision (c)

The RCSO SOI Policy 2.15, Chapter 2, page 3 states in part that; Roanoke City Sheriff's Office staff shall not conduct cross-gender frisk, or pat-down, searches on female inmates, expect for exigent circumstances. If cross-gender, frisk, pat down, or visual body cavity searches are conducted they must be documented. There were no examples of these situations over the last twelve months.

The evidence collected for this provision shows that the agency has a written policy that

prohibits staff from conducting cross-gender pat searches, except in exigent circumstances when performed by medical practitioners. Therefore through written policy, the agency has demonstrated that it meets this provision.

#### 115.15 Provision (d)

The RCSO SOI Policy 2.15 Chapter 2, pages 5&6 states that “Inmates must be able to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks”. Staff of the opposite sex shall be required to announce their presence when entering an area where detainees/inmates are likely to be doing said functions. The agency policy also addresses when staff must announce their presence when entering a housing unit of the opposite gender. The RCSO policy states that if a deputy of the opposite gender is conducting said searches, the deputy must announce their presence when entering an inmate housing unit. In addition, when conducting the site review the auditor observed half wall partitions separating toilets from view, full length shower curtains or half doors for privacy when showering and blacked out areas on monitoring screens so staff could not view inmates when using the restrooms or showers. The auditor also witnesses officers announce their presence when entering a housing block of inmates of the opposite sex.

During the on-site phase, the auditor interviewed both random staff and inmates. The 12 random staff were asked if they, or other deputies, announce their presence when entering a housing unit of inmates of the opposite sex. All 12 deputies stated that they do. When asked if inmates can dress, shower, and use the restroom without being viewed by deputies of the opposite sex, all 12 deputies stated, “Yes, they could.” The auditor also interviewed 13 random inmates and when asked if male/female deputies announce their presence when entering the housing block of the opposite sex, 11 inmates stated yes, they do and 2 inmates stated sometimes. When asked if they or other inmates are ever naked in full view of male/female officers all 13 inmates stated no they are not.

The evidence collected for this provision shows that the agency has a written policy that enables inmates to shower, perform bodily functions, and change clothes without being viewed by staff of the opposite sex. They also have a policy that require all staff to announce their presence when entering a housing unit of inmates of the opposite sex. The interviews conducted with random staff and random inmates confirmed that these policies are being practiced by staff. Therefore through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.15 Provision (e)

The RCSO agency policy states that “A strip search will not be used for the sole purpose of determining a transgender or intersex inmate’s genital status. If the inmate’s status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as a part of a broader medical examination conducted in private by a medical practitioner.” During the site review the auditor was shown a body scanner and were provided the instructions and policy on using the Body

Scanner. All inmates brought to the RSCO jail are run through the body scanner with the exception of those inmates who are pregnant or have medical conditions.

When interviewing random staff, they were asked if they were aware of the agency policy prohibiting staff from searching or physically examining a transgender person for the sole purpose of determining the inmate's genital status. All 12 random officers stated that yes, they are aware and searching for the sole purpose of identifying gender is prohibited. However, one could determine genital status by the body scanner results. At the time of this audit the RSCO informed the auditor that there were no transgender inmates housed in their facility. However, during my targeted inmate interviews one inmate identified to me as a transgender female.

#### 115.15 Provision (f)

The RSCO does not conduct cross-gender pat searches unless exigent circumstance exists. The agency provided training records and training curricula as proof of receiving training on cross-gender pat searches and searches of transgender and intersex inmates in a professional manner. During the on-site review, the auditor interviewed 12 random staff and in those interviews the deputies were asked if they had received training on how to conduct a cross-gender pat search and when did they receive the training. All 12 stated that they had received the training. From those interviews 5 deputies stated that they received the training during the initial academy training and from the RELIAS training twice a year. Also, 4 stated that they receive the training annually through the RELIAS portal and 3 stated they received the training at the Law Enforcement Training Academy.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have limits to cross-gender viewing and searches.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO SOI Policy 3.28 Chapter 3, Special Services for Hearing Impaired</li> <li>b) RCSO SOI Policy 5.01 Chapter 5, Jail Programs</li> <li>c) RCSO PREA Policy 3.33 Chapter 3, page 9, and 18</li> <li>d) RCSO Language Line Inc. Contract</li> <li>e) RCSO Inmate Handbook in both English &amp; Spanish</li> <li>f) PREA Informational Posters in both English &amp; Spanish</li> <li>g) PREA Intake Reporting Business Cards in both English &amp; Spanish</li> <li>h) Inmate Orientation Form in both English &amp; Spanish</li> <li>i) PREA Inmate Acknowledgement in both English &amp; Spanish</li> <li>j) Inmate PREA training video in both English &amp; Spanish</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Agency Head / Designee</li> <li>b) Random Staff</li> <li>c) Inmates with Disabilities or limited English proficient</li> </ul> <p>115.16 Provision a:</p> <p>The RCSO SOI Policy 3.28 Chapter 3, in its entirety states in part that; the Roanoke City Jail shall take appropriate steps to ensure that inmates/detainees with disabilities have an equal opportunity to participate in or benefit from all efforts to prevent, detect, and respond to sexual abuse and sexual harassment. In addition, written material shall be provided in formats or through methods that ensure effective communications with inmates with disabilities, including intellectual disabilities, limited reading skills, or who are blind or have low vision, or are considered hearing impaired. All inmate education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Formats include, but not limited to: interpreters for the deaf or hard (of) hearing, reading the material to visual impaired, and providing interpreters services for non-English speaking inmates. Finally, the RCSO has created a document that records an inmate has received and understands the PREA information by signature. Some of the PREA information provided is; ways to report a</p>

sexual assault, contacting an advocate, and the right to be free from all types of sexual abuse or sexual harassment.

The agency has provided documentation of a contract between the Language Line Services Inc. and the RCSO to provide interpreting services. The RCSO provides an Inmate PREA training video in English and Spanish and has a TTD device / video interpreting available for those inmates who are deaf or (have) limited hearing. During the site review the auditor observed the PREA Posters located in the housing units in both English and Spanish.

The Agency Head / Designee was interviewed and asked if his agency has established procedures to provide inmates with disabilities and inmates who are limited English can participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Agency Head/Designee stated that; yes, his agency has an ADA Coordinator and that the staff is aware of the Language Line Services that are provided. In addition, 3 inmates identified as disabled or limited proficient in English were interviewed during the on-site review phase. The inmates were asked if the facility provided information about sexual abuse that they were able to understand, and if not, did the facility provide someone to help, write, read, or explain? Finally, did the inmate understand the information that was provided? All 4 stated yes to these questions; explaining that they received the information in Spanish, provided a handbook in Spanish, and PREA Posters on the walls in Spanish.

The evidence collected for this provision shows that the agency has a written policy that addresses that the agency takes 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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.16 Provision (b)

The RCSO SOI Policy 3.28 Chapter 3, in its entirety states in part that; the Roanoke City Jail shall take appropriate steps to ensure that inmates/detainees with disabilities have an equal opportunity to participate in or benefit from all efforts to prevent, detect, and respond to sexual abuse and sexual harassment. In addition, written material shall be provided in formats or through methods that ensure effective communications with inmates with disabilities, including intellectual disabilities, limited reading skills, or who are blind or have low vision, or are considered hearing impaired. All inmate education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Formats include, but not limited to: interpreters for the deaf or hard (of) hearing, reading the material to visual impaired, and providing interpreters services for non-English speaking inmates. Finally, the RCSO has created a document in both English and Spanish that records an inmate has received and understands the PREA information by signature. Some of the PREA information provided is; ways to report a sexual assault, contacting an advocate, and the right to be free from all types of sexual abuse or sexual harassment.

The agency has provided documentation of a contract between the Language Line Services Inc. and the RCSO to provide interpreting services. The RCSO provides the Inmate PREA

training video in English and Spanish. In addition, when first processed the RCSO provides a business card with the ways to report sexual abuse in Spanish. During the site review the auditor observed the PREA Posters located in the housing units in both English and Spanish. Finally, the agency has fluent staff that are considered proficient in a particular language and authorized to interpret.

During the interview process 3 inmates identified as disabled or limited proficient in English were interviewed during the on-site review phase. The inmates were asked if the facility provided information about sexual abuse that they were able to understand and if not did the facility provide someone to help, write, read, or explain? Finally, did the inmate understand the information that was provided? Two inmates were considered "limited English proficient" and they stated yes to these questions explaining that they received the information in Spanish, provided a handbook in Spanish, and PREA Posters in Spanish on the walls.

The evidence collected for this provision shows that the agency has a written policy that addresses that the agency takes appropriate steps to ensure that inmates who are "limited English proficient" 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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.16 Provision (c)

The RCSO PREA Policy 3.33 Chapter 3, page 9 paragraph 15, states in part "Inmates shall not be utilized as interpreters."

During the audit interview process the auditor asked 12 random staff if the agency ever allows the use of inmate interpreters. All 12 random staff stated that they would not use inmate interpreters. In addition, those same 12 random staff members stated that they would either use staff interpreters or the language line as an additional option.

The evidence collected for this provision shows that the agency has a written policy that addresses that the agency shall not rely on inmate interpreters. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard referencing requirements for inmates with disabilities and inmates who are limited English proficient have equal opportunity or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

**115.17 Hiring and promotion decisions**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:

Documents:

- a) RSCO SOI Policy 1.07 Chapter 1, Hiring and Selection Process pages 2 & 3
- b) RSCO SOI Policy 1.08 Chapter 1, Promotional Process page 1
- c) RSCO SOI Policy 5.16 Chapter 5, Roles of Consultants and Contract Employees
- d) Memorandum from Assistant Chief Correctional Officer dated 12/08/2017, stating the RSCO's process of running Criminal Histories on all staff and contractors has been completed
- e) Examples of Deputy Pre-Hire Personal History Applications with PREA questions.
- f) Officer Interview Questions
- g) Staff Employee Files

Interviews:

- a) Interview with Human Resources Staff

Observations made during the On-Site Audit and Document Review

115.17 Provision (a)

RSCO SOI Policy 1.07 chapter 1, pages 2&3, states in part; The Sheriff's Office shall consider any incidents of sexual harassment in determining whether to hire anyone, or to enlist the services of any contractor, who may have contact with inmates. The Sheriff's Office shall not hire or promote anyone who may have contact with inmates. They also shall not enlist the services of any contractor who may have contact with inmates who has any previous history related to sexual abuse, harassment, or misconduct in a confinement setting. Therefore, the following procedures shall be followed:

- a. If applicant has previous contact with inmates, they shall not be considered if the applicant has;
  - 1. Engaged in sexual abuse or sexual harassment in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution.
  - 2. Been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent



or was unable to consent or refuse or;

3. Been civilly or administratively adjudicated to have engaged in the activity described in a) (2) of this section.

During the file review part of this audit 10 personnel files were sampled. This sample included civilian staff, volunteers, contractors, and security staff. The review resulted in 8 files indicating an initial criminal history being ran. Two files contained no evidence. These files were on medical staff that had previously worked with the outgoing medical contractor who lost the current contract and took the personnel files with them when the new contractor came in. In addition, the PREA Coordinator provided 5 Personal History Questionnaires with evidence that pre-hire interview questions regarding past conduct were asked and answered.

The evidence collected for this provision shows that the agency has a policy prohibiting the hiring or promoting anyone who may have contact with inmates if they had engaged in sexual abuse in jail. If convicted of engaging or attempting to engage in sexual abuse and had been civilly adjudicated due to engaging in these activities. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (b)

RCSO SOI Policy 1.08 Chapter 1, page 1 states in part that; Pursuant to PREA standard 115.17, the Roanoke City Sheriff's Office shall not promote anyone who may have contact with inmates who:

a) Has engaged in sexual abuse in prison, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997).

b) 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;

c) Has been civilly or administratively adjudicated to have engaged in such activity.

The Roanoke Sheriff's Office shall consider any incidents of sexual harassment in determining whether to promote anyone who may have contact with inmates.

During the audit interview process the Human Resources staff member was asked if the agency considers prior incidents of sexual harassment when determining whether to hire or promote anyone and to enlist services of any contractors. The H.R. staff member stated that they do consider those prior incidents and red flags the file. The H.R. staff member stated that

she would confide in the Chief Deputy for a recommendation.

The evidence collected for this provision shows that the agency has a policy requiring the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (c)

RCSO SOI Policy 1.07 Chapter 1, R-1.02, page 3, in part states that; The Sheriff will assign an impartial investigator to conduct a thorough background investigation of the applicant. Background investigation includes but is not limited to criminal history, school records check, employment check, reference interviews, neighborhood checks, etc. Criminal background record checks will be conducted initially and at least every five years thereafter on employees or contractors who may have contact with inmates a criminal background records check will be conducted before hiring new employees or enlisting services from volunteers or contractors who may have contact with inmates.

RCSO SOI Policy 1.07 Chapter 1, page 2, in part states that: Consistent with Federal, State, and local law the Sheriff's Office shall 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. Also, unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving PREA 115.17 115.17(a) (b) (a)-1 (a)-2 (a)-3 (f) (g) (c)-2 (f)(h) SOI 1.07.

During the audit interview process the H.R. staff member was asked if the facility performs criminal record background checks for all newly hired sworn employees, considered for promotion, and any contractor that may have contact with inmates. The H.R. staff member stated that; She performs a criminal record check on all new hires, volunteers, contractors, and current employees every three years through the VCIN system. The auditor reviewed 10 personnel files. The auditor determined that 8 files had proof of a criminal record check. Two files both from the medical section was missing documentation due to a recent change in medical vender and the previous medical contractor took the employee files with them.

The evidence collected for this provision shows that the agency has a policy requiring that criminal records be run on all new employees. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (d)

RCSO SOI Policy 1.07 Chapter 1, page 3 states in part that; Criminal background checks will be conducted initially and at least every five years thereafter on employees or contractors who may have contact with inmates. Page 2 states; consistent with Federal, State, and local laws RCSO will 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.

During the audit interview process the H.R. staff member was asked if the facility performs criminal record background checks for all newly hired sworn employees, considered for promotion, and any contractor that may have contact with inmates. The H.R. staff member stated that; She performs a criminal record check on all new hires, volunteers, contractors, and current employees every three years. The auditor reviewed 10 personnel files. The auditor determined that 8 files had proof of a criminal record check. Two files did not due to a change in medical vendors. Of those 10 files, four files were contractors.

The evidence collected for this provision shows that the agency has a policy requiring that criminal records be run on all new contractors that have contact with inmates. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (e)

RCSO SOI Policy 1.07 Chapter 1, page 3 states in part that; Criminal background checks will be conducted initially and at least every five years thereafter on employees or contractors who may have contact with inmates. Page 2 states; consistent with Federal, State, and local laws RCSO will 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.

During the audit interview process the H.R. staff member was asked if the facility performs criminal record background checks for all sworn employees, and any contractor that may have contact with inmates. The H.R. staff member stated that; She performs a criminal record check on all new hires, volunteers, contractors, and current employees every three years. The auditor reviewed 10 personnel files. The auditor determined that 8 files had proof of a criminal record check. Two files did not due to a change in medical vendors. Of those 10 files, four files were contractors.

The evidence collected for this provision shows that the agency has a policy requiring that criminal records check be run on all employees, contractors, and volunteers at least every five years. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (f)

RCSO SOI Policy 1.07 Chapter 1, page 2 states in part that; If applicant has previous contact with inmates, they shall be asked directly about previous misconduct in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of the reviews of current employees. Employees shall have a continuing affirmative duty to disclose any such misconduct. Material omissions regarding such misconduct shall be grounds for termination. During the interview with the H.R. staff member, it was asked if the facility ask all applicants and employees about previous misconduct regarding inmates and does the facility impose upon employees a continuing affirmative duty to disclose previous

misconduct. The H.R. staff member stated that the agency has a list of questions that must be answered on the Pre-Hire Questionnaire as part of the background investigation. She also stated that yes, all employees must report any misconduct or interaction with law enforcement to include traffic summons. The agency provided copies of staff personal history applications with the questions and answers given.

The evidence collected for this provision shows that the agency has a policy requiring that they ask about previous misconduct and the employee's responsibility to disclose such misconduct. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (g)

RCSO SOI Policy 1.07 Chapter 1 page 2 states in part that; Employees shall have a continuing affirmative duty to disclose any such misconduct. Material omissions regarding such misconduct shall be grounds for termination. There are no examples or circumstances over the last twelve months to provide documentation for this provision.

The evidence collected for this provision shows that the agency has a policy requiring that material omissions regarding such misconduct or the provision of materially false information are grounds for termination. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### 115.17 Provision (h)

RCSO SOI Policy 1.07 Chapter 1, page 2 states in part that ; Consistent with Federal, State, and local law, the Sheriff's Office shall 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. Also, unless prohibited by law, the agency 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 to work. The H.R. staff member was asked during the interview, if a former employee applies for work at another institution and a request by that institution is made does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving that former employee. The H.R. staff member stated that the agency would disclose those allegations given a formal request.

The evidence collected for this provision shows that the agency has a policy requiring that unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse and sexual harassment involving former employee upon receiving a request from an institutional employer for whom the employee has applied to work. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring hiring and promotional decisions.

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) Memorandum dated 12/16/2019 from the Deputy responsible for IT functions, documenting the updates in monitoring and surveillance equipment installed by the RCSO at the city jail.</p> <p>b) Memorandum dated 12/07/2018 from the Deputy responsible for IT functions, documenting the updates in monitoring and surveillance equipment installed by the RCSO at the city jail.</p> <p>Interviews</p> <p>a) Interview with Agency Head / Designee</p> <p>b) Interview with Warden / Designee</p> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.18 Provision (a)</p> <p>The agency has not acquired a new facility or made a substantial expansion to existing facility since the last PREA audit in 2017.</p> <p>During the audit interview phase the Agency Head / Sheriff was asked that when planning substantial modifications to the facility, “how does the agency consider such changes on its ability to protect inmates from sexual abuse?” The Agency Head stated, “This is absolutely one of the first considerations, making sure of good coverage and identifying possible blind spots.” In addition, the Warden/Designee was also asked the same question. The Warden / Designee stated, “there had been no current renovations to the facility since 1995.” However, they are adding cameras to address both PREA and mental health considerations.</p> <p>The evidence collected for this provision shows that the agency shall consider the effect of such design to improve the ability to protect inmates from sexual abuse. Therefore, through personal observations, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>Provision B:</p> <p>The RCSO has provided two memorandums authored by the technology deputy addressing the current ongoing additions and replacements of cameras, monitors, and software to enhance security and sexual safety. The most recent memorandum lists the addition of 24 new cameras along with replacing monitors and upgrading software. Over the last two years an additional 46 cameras were added to the facility.</p>

During the audit interview phase the Agency Head was asked how the agency uses monitoring technology. The Agency Head stated that; cameras are placed inside areas that are commonly used for inmates to travel to and from one location to another. They also try to identify blind spots that can be addressed by additional camera footage. Lastly, utilizing the recording capabilities to assist in investigations and capture evidence. The Warden / Designee was also asked a similar question about how the facility had considered using technology to enhance inmates' protection from sexual abuse. The Warden/Designee stated that; the agency tries to purchase the best quality equipment, capture blind spots, and be as effective as possible.

During the on-site review tour the auditor observed security cameras and monitors located throughout the facility.

The evidence collected for this provision shows that the agency has considered how technology may enhance the agency's ability to protect inmates from sexual abuse. Therefore, through written memorandums, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard addressing upgrade to facilities and technology.

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3, Pages 8, 9, 12</li> <li>c) RCSO SOI Death or Serious Injury Policy 6.06 Chapter 6 Pages 2,3, and 4</li> <li>d) Letter of Agreement between Roanoke City Sheriff’s Office and the Roanoke City Police Department (effective date 02/17/2017)</li> <li>e) Memorandum of Agreement between RCSO and the Sexual Assault Response and Awareness (SARA) of Roanoke (effective date 06/26/16)</li> <li>f) Wellpath memo dated 03/03/2020, identifying the “Designated Hospital”</li> <li>g) RCSO Coordinated Response “Sexual Assault Investigative Checklist”</li> <li>h) Assistant Chief Deputy Memo dated 08/07/20 referencing 115.21 provision (b)</li> </ul> <p>Interviews</p> <ul style="list-style-type: none"> <li>1. Interview with SANE/SAFE staff</li> <li>2. Interview with inmate who reported a sexual abuse</li> <li>3. Interview with the PREA Coordinator</li> <li>4. 12 interviews with random staff</li> </ul> <p>Observations during on-site review of physical plant.</p> <p>115.21 Provision (a)</p> <p>During the review phase of the Pre-Audit Questionnaire the auditor reviewed the standing Letter of Understanding (LOU) between the RCSO and Roanoke City Police Department (RCPD). This MOU indicated that the RCPD was responsible for all criminal investigations that occur in the city jail. The PREA Coordinator was contacted and asked this question. The PREA</p>

Coordinator explained the RCPD conducts all criminal sexual assault investigations at the RCSO jail. On 06/17/2020 the auditor contacted the RCPD Criminal Investigation Bureau to establish if they did in fact conduct alleged sexual assault criminal investigations at the RCSO facility. Arrangements were made by the Auditor to contact the supervisor of detectives via phone call. On 06/17/2020, the auditor contacted a Detective Sergeant with the RCPD Sex Crimes Unit. He informed me that they do in fact investigate all criminal sexual assault allegations and acknowledged that the only requirement needed to send an investigator is an official request from the facility. The RCPD is responsible for investigating allegations of sexual crimes that occur within the RCSO facility and is familiar with PREA standard 115.21 pertaining to the investigation of sexual assaults, the collection of evidence, and forensic examinations. Furthermore, the facility provided Sheriff's Operating Instructions PREA Policy 3.33 page 8, paragraph 6 in the PAQ states in part states that; "All credible allegations of forcible sexual assault will be reported to the Sex Offenses Unit of the Roanoke City P.D. as soon as possible in order to preserve physical evidence." The RCSO also provided agency PREA Policy 3.33 and the RCSO Coordinated Response document called "Sexual Assault Investigation Checklist" in response to the PAQ as standard operating procedures to follow when collecting evidence in a sexual abuse incident. Agency PREA policy 3.33 page 9, paragraph 21 states in part that; "investigators shall gather and preserve direct and circumstantial evidence, including any available physical evidence and any available electronic monitoring data."

When the Auditor interviewed 12 random staff it was determined that all 12 staff were aware of their responsibilities to preserve evidence during a sexual abuse allegation. They discussed securing the scene, notifying a supervisor immediately, contacting medical personnel, writing a detailed report and not allowing the victim or accuser to bathe. Also, when asked who was responsible for investigating criminal and administrative cases, 9 staff members were aware that the Roanoke City Police investigates criminal cases and 3 believed it was the responsibility the RCSO Professional Services Branch. All 12 staff were aware that RCSO trained investigators investigate administrative cases. Most staff interviewed were therefore aware of the protocol for evidence collection.

The evidence reviewed for this provision shows that the agency has demonstrated that they do follow a uniform evidence protocol for obtaining physical evidence for administrative and criminal proceedings. Therefore, through written policy, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (b)

The facility provided a memorandum dated 08/07/2020 from RCSO Assistant Chief Deputy that states that the Roanoke City Jail has not housed any youthful offenders. However, the RCSO has entered into a MOU with the Roanoke City Police Department to conduct criminal investigations within the Roanoke City Jail. The RCSO provided proof that the Roanoke City Police has been accredited by the Commission on Accreditation for Law Enforcement Agencies, which is considered the gold star standard in Public Safety. By being accredited by CALEA this would suggest that all necessary protocols would be adapted and followed on the



most recent edition of the Department of Justice (DOJ's) Office on Violence Against Women publication in accordance with this standard.

#### 115.21 Provision (c)

The facility offered the RCSO SOI PREA Policy 3.33 as documentation to follow when a forensic examination is needed. PREA Policy 3.33 page 12, section 2, paragraph 1 states in part that "Upon receipt of a complaint of forcible sexual assault for which there may be physical evidence, all victims of sexual abuse shall be offered and may be transported to a hospital where a SANE or SAFE is available to conduct a physical / forensic examination, without financial cost and in cooperation with the Roanoke City P.D.

Any allegations of sexual abuse that appears criminal will be referred to the RCPD for criminal investigation. The alleged victim shall be immediately transported to Carilion Roanoke Hospital to be examined by a medical professional who is skilled and experienced in the use of rape kits for the collection of forensic evidence." The Carilion Hospital shall employ a Sexual Assault Nurse Examiner (SANE) or a Sexual Assault Forensic Examiner (SAFE). In addition, PREA Policy 3.33 also states that treatment services shall be provided to the alleged victim without financial costs to the victim.

The facility provided a document from the Forensic Nursing Unit of Carilion Clinic, which states in part that; "the program serves as a link between the judicial system, law enforcement, community services, and laboratories that process evidence following a violent act. Carilion Hospital Forensics' Unit is a licensed health care facility that will provide health care services to offenders housed in a state or local correctional institution. An offender who is a victim of an alleged sexual abuse may be transported to Carilion Hospital for a sexual assault forensic examination. The hospital employs one or more staff members trained in sexual assault examination. The hospital agrees that any such examination will be performed by a nurse trained in sexual assault examination under the direction of a physician or the physician him/herself within the first 72 hours."

The PREA Coordinator replied in the Pre-Audit Questionnaire stating that the facility did not experience any sexual abuse allegation requiring a forensic examination by a SAFE/SANE nurse or physician during the last calendar year. In addition, during the interview with the PREA Coordinator, he stated that the facility did not have a situation where an inmate was referred to the hospital for a forensic examination.

Prior to the on-site audit at the RCSO jail, an interview was conducted by the auditor with a Sexual Assault Nurse Examiner (SANE). The interview was conducted by phone with a SANE Nurse employed with the Carilion Roanoke Hospital, which is located in Roanoke Virginia. A SANE nurse is a highly skilled certified nurse trained in the art of evidence collection and chain

of custody. The nurse is considered the subject matter expert in collecting evidence after an alleged sexual assault has occurred. The nurse is also required to provide testimony in court cases related to sexual abuse. The Nurse explained that she was aware of the MOU between the RCSO and the Roanoke City P.D. when it comes to conducting SANE exams. She explained that Carilion Hospital conducts most all SANE exams for the surrounding jurisdictions. When asked if the Carilion Hospital Forensics Unit is responsible for conducting all forensic medical exams for the RCSO jail, the SANE Nurse stated, "Yes they are, the hospital offers forensic services." When asked if SANE staff is unavailable to conduct forensic medical examinations then who assumes the responsibility? The SANE Nurse replied, "In the event SANE is not available, the individual would be transferred to the nearest hospital that conducts SANE exams."

As of the date of the on-site audit, the facility reported in the last 12 months there has been no forensic medical examinations performed by a SANE or SAFE.

The evidence collected for this provision shows that the agency has procedures in place to offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost to the victim. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.21 Provision (d)

The facility has provided a Memorandum of Agreement (MOA) between SARA of Roanoke and RCSO dated 06/26/2017. SARA is a victim services advocate that provides confidential support and assistance to sexual assault victims in Roanoke Virginia. In accordance with 42. USC 14043g (b) (2) (c) the requirements to be considered a "rape crisis center" are as follows:

1. Provide a 24-hour hotline
2. Accompaniment and advocacy through the medical, criminal justice, and social support systems.
3. Short-term crisis intervention support.
4. Information and referral to assist sexual assault victim and family
5. Community out-reach for underserved communities
6. The development and distribution of materials on issues related to the above listed issues.

The auditor has reviewed the SARA website to determine that this advocacy group does meet all the criteria listed above to be considered a "rape crisis center."

The MOA states that SARA will maintain a trained pool of advocates to respond to sexual assault and maintain confidentiality as required by state standards for certified crisis counselors.

The PREA Coordinator was interviewed by the auditor and stated that staff would allow access to a victim advocate if the inmate requested. The PREA Coordinator also stated that the facility provides access to SARA through phone or mail advertised in every block. Finally, the one inmate interviewed during the on-site interview process that reported a sexual harassment incident within the facility, which the facility classified as unfounded after an initial investigation stated that he was not allowed to contact anyone. Also, that he requested SARA information be provided. When interviewing this inmate, he described his allegation as a complaint against a staff member (medical staff) who made some sexual comments to him in a sexual manner. This allegation would not rise to the level of sexual abuse, but rather, the sexual harassment. Therefore, this inmate's experience is not relevant to this provision.

During the on-site review, the auditor spoke to several inmates who confirmed the availability to contact SARA via phone. This demonstrates the facility's attempt to make available to victims of sexual abuse a victim advocate from a rape crisis center.

The evidence collected for this provision shows that the agency has demonstrated that they do offer services from a victim advocate from a rape center that is not associated with the criminal justice system or law enforcement and provides confidentiality. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (e)

The facility has provided the RCSO MOA with SARA as a standard operating procedure addressing when a victim advocate can accompany an alleged sexual assault victim through the forensic examination and during the investigatory interview process. The MOA states in part that; "Upon request of the victim or someone requesting on behalf of the victim, have a trained qualified advocate available to accompany and support the victim through the forensic medical examination process and investigatory interviews within a reasonable period of time." The victim advocate shall meet the inmate at the hospital to accompany and support the alleged victim through the forensic examination.

The RCSO PREA Coordinator stated that the facility did not experience any sexual abuse allegation requiring a forensic examination by a SAFE/SANE nurse or physician during the last

calendar year. In addition, when asked how the agency ensures that the advocate meets the qualifications described above the Coordinator stated that the service is coming from an official rape crisis center.

The evidence collected for this provision shows that the agency has demonstrated that they do allow victim advocates to accompany and support alleged victims of sexual assault during the forensic examination and during the investigatory interview. Therefore, through written policy, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (f)

The facility offered RCSO SOI PREA Policy 3.33 page 8, paragraph 6 in the PAQ states in part that; "All credible allegations of forcible sexual assault will be reported to the Sex Offenses Unit of the Roanoke City P.D. as soon as possible in order to preserve physical evidence." In addition, the RCSO has provided a Commission on Accreditation for Law Enforcement Agencies (CALEA) certification for the Roanoke City P.D. that mandates the agency follow the PREA standard 115.21 (a-f).

The evidence collected for this provision shows that the agency has demonstrated that the Roanoke City Police Department follow the provisions outlined in this provision. Therefore, through written policy, and verbal agreement, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (g)

The auditor is not required to audit this provision.

#### 115.21 Provision (h)

The auditor is not required to audit this provision

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the agency to provide evidence protocols and forensic medical evaluations.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) RCSO Main PREA Investigation Log</li> <li>d) RCSO Website</li> <li>e) Letter of Understanding between RCSO and RCPD</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head</li> <li>b) Interview with Investigative Staff</li> </ul> <p>Observations made during the Pre-Audit Phase of the Audit.</p> <p>115.22 Provision (a)</p> <p>RCSO SOI PREA Policy 3.33 page 6 states in part that; “The Office will investigate any allegations and suspicions of sexual abuse and sexual harassment toward any inmate(s).” Page 8 of the same policy states in part that; “All credible allegations of forcible sexual assault will be reported to the Sex Offenses Unit of the Roanoke City Police Department as soon as possible to preserve physical evidence. All allegations referred to the Roanoke PD will be thoroughly and promptly investigated.” Page 10 of the PREA Policy states in part that; Investigations of sexual misconduct shall be investigated by a RCSO Investigator trained in PREA investigations. Finally, The LOU between the RCSO and RCPD state that the RCPD is responsible for all criminal investigations conducted at the Roanoke City Jail. The facility has trained Specialized Investigators that conduct the administrative investigations. When a sexual abuse allegation is made an initial inquiry is conducted by a trained investigator to determine who, what, when, where, and how. If it is determined that probable cause exists that a crime may have been committed the Chief Deputy is notified. The Chief Deputy contacts the Roanoke City Police and requests that a criminal investigation be initiated.</p> <p>In the past twelve months the RCSO reported that they had received 18 allegations of sexual abuse or sexual harassment. Out of those allegations, 18 administrative investigations were conducted, and zero allegations were referred for criminal investigation.</p> <p>While interviewing the Agency Head, he stated that the Roanoke City Police handle all criminal cases and that his agency handles all administrative cases. The Agency Head also stated that when a sexual abuse allegation is made, a trained investigator conducts an initial inquiry,</p>

evidence is collected, and interviews are conducted. The information is turned over to himself and command staff, a meeting is established, and a decision is made to the outcome of the initial investigation. That information is turned over to command staff member who makes notification with the Roanoke Police for investigation, if necessary. If it is determined that there is no criminal activity then the RCSO performs an administrative investigation.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative or criminal investigation is completed on all allegations of sexual abuse and sexual harassment. Therefore through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.22 Provision (b)

RCSO PREA Policy 3.33 Chapter 3, page 8 states in part that; "All credible allegations of forcible sexual assault will be reported to the Sex Offenses Unit of the Roanoke City Police Department as soon as possible to preserve physical evidence. All allegations referred to the Roanoke PD will be thoroughly and promptly investigated." The LOU between the RCSO and RCPD state that the RCPD is responsible for all criminal investigations conducted at the Roanoke City Jail.

The agency's website at [http://www.Roanokeva.gov/Sheriff's Office](http://www.Roanokeva.gov/Sheriff's%20Office) states that, "The Roanoke City Sheriff's Office has a zero-tolerance policy for all forms of sexual abuse and sexual harassment against inmates. That they will aggressively pursue any allegation of sexual misconduct, up to and including prosecution under Virginia Code. The website also states that; "all credible allegations of forcible sexual assault will be reported to the Sex Offenses Unit of the Roanoke City Police Department."

During the on-site phase of this audit the auditor interviewed the supervisor of the investigative staff. The investigative staff member was asked if agency policy requires that allegations of sexual abuse be referred for investigation to an agency with the legal authority to conduct criminal investigations unless the allegation does not involve potential criminal activity. The investigator stated, "yes, the agency has a memorandum of agreement with the Roanoke PD to conduct criminal sexual abuse investigations."

The evidence collected for this provision shows that the agency has procedures in place to ensure that an outside law enforcement agency with jurisdiction performs criminal investigations on all allegations of sexual abuse. Therefore through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### Provision (c):

The Roanoke City Police Department is responsible for all investigations involving criminal activity at the RCSO jail to include all sexual abuse allegations. There is a Letter of Understanding dated 02/15/2017 stating such. This PREA Auditor contacted the RCPD Sex Crimes Unit and confirmed with a supervisor that the Roanoke City Police will send a detective to the facility for investigative purposes upon request from the RCSO and confirmed this

practice in past instances. The Roanoke City Police is obligated to conduct a criminal investigation upon notification by the facility of a potential forcible sexual assault because of the LOA currently in place.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the agency to ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

<b>115.31</b>	<b>Employee training</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 2.22 Chapter 2, Staff Training</li> <li>c) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>d) RCSO SOI Policy 5.02 Chapter 5, Citizen Involvement &amp; Volunteer Services</li> <li>e) Relias Learning PREA Introduction &amp; Overview Curriculum</li> <li>f) Memorandums dated 4/13/20, 02/5/19, and 01/18/18 from the Training Coordinator documenting the completion of the agency’s PREA annual refresher training</li> <li>g) RCSO Volunteer/Contractor Agreement</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Random Staff</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.31 Provision (a)</p> <p>The RCSO provides PREA refresher training to all their employees on an annual basis. The facility also trains contractors and volunteers during their initial orientation process and then annually. New hires are trained while in the academy and then on an annual basis. The RCSO has provided the Relias Learning PREA Introduction &amp; Overview Curriculum that shows along with agency policy 3.33 page 14 that states all RCSO employees that have contact with inmates will be trained on the following.</p> <ul style="list-style-type: none"> <li>· zero-tolerance</li> <li>· inmates’ rights</li> <li>· the right to be free from retaliation</li> <li>· dynamics of sexual abuse in a jail setting</li> <li>· common reactions to sexual abuse</li> <li>· how to detect and respond to signs of sexual abuse</li> <li>· how to detect inappropriate relationships</li> </ul>	



- awareness of VA code 18.2-64.2 (carnal knowledge of an inmate)
- cross gender and transgender pat searches
- effectively communicating with LGBTQ inmates, and mandatory reporting laws

During the interview process 12 random staff were asked if they had received PREA training and if so, when? All 12 deputies indicated that they have received the training. 9 deputies stated that they received training in both the academy and through Relias training. 5 deputies stated that they received PREA training bi-annually and 3 deputies stated training was on an annual basis. The other 4 deputies did not specify how often they received PREA training.

The evidence collected for this provision shows that the agency has procedures in place to train all employees on all relevant topics outlined in this standard provision. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.31 Provision (b)

The training provided to the RCSO staff covers both male and female inmates. Therefore, there is no need to require additional training for gender specific facilities due to a transfer. This facility houses both male and female inmates.

The evidence collected for this provision shows that the agency has trained all employees in all aspects of PREA regardless of specific gender facilities. Therefore, there is no need to provide additional training when transferred to a facility that holds only one specific gender.

#### 115.31 Provision (c)

The RCSO provides PREA training on a yearly basis. All new employees receive initial training when attending the academy. All new contractors and volunteers receive their initial training during the orientation process and then annually. This practice was confirmed by sampling 10 employee training records. The files indicated that all 10 employees received initial PREA training, 12 staff members acknowledged receiving the training during interviews and 10 documented receiving refresher training. Finally, the RCSO provided several memorandums from the Training Coordinator documenting the completion of the agency's annual PREA refresher training.

The evidence collected for this provision shows that the agency has provided initial and refresher PREA training to all their employees at least once a year. Therefore, through written policy and file review observations, the agency has demonstrated that it meets this provision.

#### Provision (d)

The RCSO provided examples of employee training acknowledgement forms that requires the employee to sign acknowledging that he/she understands the training that was provided. The agency also provided Relias PREA training rosters and Relias PREA Quizzes.

The evidence collected for this provision shows that the agency has provided documentation through employee signature, acknowledging that the employee understands the training received. Therefore, through written policy and file review observations, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the agency train all employees who have contact with inmates on its zero tolerance policy for sexual abuse and/or harassment, and how to fulfill their responsibilities for preventing, detecting, reporting, and responding to sexual abuse. The inmates and employees rights to be free from retaliation, inmates right to be free from sexual abuse, the dynamics of sexual abuse in confinement, common reactions of sexual abuse victims, how to communicate effectively with inmates, including LGBTQ inmates; and how to comply with relevant laws related to mandatory reporting of sexual abuse.

115.32	<b>Volunteer and contractor training</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 5.02 Chapter 5, Citizen Involvement &amp; Volunteer Services</li> <li>c) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>d) RCSO SOI Policy 2.22 Chapter 2, Staff Training</li> <li>e) PREA Zero Tolerance notification signature form</li> <li>f) RCSO Volunteer/Contractor Acknowledgement Form</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with Volunteer</li> <li>b) Interview with Contractor</li> </ul> <p>115.32 Provision (a)</p> <p>RCSO SOI Policy 5.02 Chapter 5, page 2 states in part that; “Orientation Training for volunteers should recognize that this is the first time most of these people have ever been in or connected with a jail. Consequently, training will include an orientation appropriate to the nature of the assignment, tour of the facility, review of procedures regarding security of the jail and confidentiality of information, responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures, and procedures to be followed.” All volunteers and contractors, who have contact with inmates will be trained on the RCSO PREA policy and its zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>The facility currently has 96 contractors and volunteers with 100% participation in training. There are nineteen contractors, 30 educational volunteers, and 41 religious volunteers. Volunteers and Contractors are trained during their initial orientation and are required to acknowledge that they have received the necessary PREA training by signing a PREA training acknowledgement form and checklist. Contractors are never left alone with inmates and must be escorted by security staff. The facility maintains all copies of signed volunteer and contractor acknowledgement forms.</p> <p>During the interviews with 3 volunteers and one contractor the auditor asked if they had been trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection, and response. All 4 individuals answered in the affirmative.</p>	

While performing the document review the auditor observed several signed acknowledgement forms from both volunteers and contractors.

The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors that have contact with inmates are trained on the prevention, detection, and response policies regarding sexual abuse and sexual harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.32 Provision (b)

RCSO SOI Policy 5.02 Chapter 5, page 2 states in part that; "Orientation Training for volunteers should recognize that this is the first time most of these people have ever been in or connected with a jail. Consequently, training will include an orientation appropriate to the nature of the assignment, tour of the facility, review of procedures regarding security of the jail and confidentiality of information, responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures to be followed." All volunteers and contractors who have contact with inmates will be trained on the RCSO PREA policy and its zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

The facility currently has 96 contractors and volunteers with 100% participation in training. There are nineteen contractors, 30 educational volunteers, and 41 religious volunteers. Volunteers and Contractors are trained during their initial orientation and are required to acknowledge that they have received the necessary PREA training by signing a PREA training acknowledgement form and checklist. The facility maintains all copies of signed volunteer and contractor acknowledgement forms.

When interviewing the 3 volunteers, they stated that training consists of what to do when approached about sexual abuse. How they would tell a supervisor and write a statement about what had occurred. They stated that they have been made aware of the agency's zero-tolerance policy. When the contractor was asked the same questions her response was that she received the PREA training on the first day of employment, and that if someone made an allegation of sexual abuse to her then she would notify a Lieutenant or above.

The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.32 Provision (c)

RCSO Agency policy 5.02 Chapter 5, page 1 states in part that; the volunteer/contractor will agree in writing to abide by all departmental policies. All training is documented with the signature of the employee, volunteer, or contractor verifying they understand the training.

The volunteer and contractor acknowledgement forms are maintained by the PREA Coordinator and observed during the document review phase of this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors documentation confirming that they received PREA

training and understood that training. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring PREA training for both volunteers and contractors.

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 3.05 Chapter 3, Receiving &amp; Admitting Inmates</li> <li>c) RCSO SOI Policy 3.03 Chapter 3, Classification of Inmates</li> <li>d) RCSO SOI PREA Policy 3.33, Chapter 3</li> <li>e) Memorandum dated 04/07/2020 from the Supervisor of the Classification Section (Language Barrier Capabilities)</li> <li>f) RCSO Inmate Handbook in English and Spanish</li> <li>g) PREA Posters in Spanish</li> <li>h) PREA Educational Cards (providing the ways to report sexual abuse) in Spanish</li> <li>i) PREA brochure in Spanish</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with Intake Staff</li> <li>b) Interview with Random Inmates</li> </ul> <p>115.33 Provision (a)</p> <p>RCSO SOI Policy 3.05, Chapter 3, page 4 states in part that; During the receiving screening process, deputies will identify and monitor arrestees who are at risk for sexually assaultive behavior and those who have been identified at being at risk for sexual victimization. Any arrestee identified during this process will be housed individually while awaiting classification into the jail. Also, all arrestees will be informed and given education of the Sheriff's Office zero-tolerance policy regarding inmate sexual abuse and reporting. The facility identified that there were 3444 inmates admitted into their facility in the last twelve months. Of those 3444 inmates all received the initial PREA information during the intake process.</p> <p>During the facility site review, this auditor requested that the booking officer provide me with the agency's information on their zero-tolerance policy and ways to report a sexual abuse allegation during the initial booking process. The deputy presented a document the size of a business card, which is referred to as an "Educational Card." On that card was all the necessary information that is required. The following day the auditor requested the educational card Spanish and the PREA Coordinator immediately provided that document.</p>

This proved that the initial information is readily available and can be provided.

During the interview with the Intake Officer, he explained that part of his responsibility during the booking process is to issue every inmate upon commitment an Educational Card, which has the ways to report a sexual abuse allegation and the agency's zero-tolerance policy. He also stated that there are posters mounted on the walls throughout the facility that explains these same instructions. When the auditor interviewed 13 random inmates they were asked if they had received information about the facility's rules against sexual abuse and harassment. From those inmates interviewed, all 13 stated that they had received the information.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates receive information explaining how to report sexual abuse and the agency's policy on zero-tolerance for sexual abuse or harassment. Therefore through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (b)

RCSO SOI Policy 5.03 Chapter 5, page 17 states in part that; During the classification process orientation will be provided for all new inmates, during which they will receive a handbook with information on rules of inmate conduct and sanctions for offenses; sexual abuse/assault. Inmates will also view a Prison Rape Elimination (PREA) Inmate Educational Video that explains the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Following orientation, the inmate must sign and date an "Inmate Orientation Form."

RCSO SOI Policy 5.03 Chapter 5, page 7, states in part that; inmates shall begin the classification process approximately twenty-four hours after being committed to jail. All inmates must complete the classification process before being housed in the general inmate housing area of the jail.

The RCSO identified 1542 inmates whose length of stay in the facility was over 30 days or more in the last twelve months. Of those 1542 inmates the facility reports that all have received the comprehensive PREA education regarding sexual abuse or harassment.

The Auditor interviewed an Intake Officer who stated that the classification officers show a PREA video during the process ensuring the inmates are educated regarding their rights to be free from sexual abuse and free from retaliation. When asked how long from the date of intake are inmates made aware of these rights, the officer stated approximately 24 hours. The auditor also interviewed 13 random inmates. Those inmates were asked If they were told about their right to not be sexually abused, how to report a sexual abuse, the right not to be punished for reporting a sexual abuse, and how long before they were made aware of these policies. Of these 13 inmates, 11 stated that they were told, one said he did not recall, and one female said she was not told. They identified several ways that they received this information. 2 inmates identified the handbook, 11 inmates identified the PREA Video, 2 inmates identified PREA paperwork and one stated that there is a recorded message on the phones that you must completely listen to every time you use the phone.

The auditor also had an opportunity to see a classification process of a newly admitted inmate. The auditor observed the inmates watching the PREA video.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates receive a comprehensive education regarding their right to be free from sexual abuse, sexual harassment, and all forms of retaliation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (c)

This procedure is not relevant since all inmates at the RCSO jail have been educated on sexual abuse and harassment. All inmates regardless of being transferred from another facility are required to go through the classification process and watch the PREA video.

When the Intake Officer was asked how they ensure that current inmates along with those transferred from another facility have been educated on agency's zero-tolerance policy on sexual abuse, he stated that when the inmate is booked-in there are a series of questions that are asked. Questions like if the individual has ever been sexually assaulted or if they are part of the LGBTQ community. He also stated that all inmates must be classified and it is during that process that the inmate must watch a PREA educational video.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates who have not received PREA education shall be educated within 1 year of the effective date. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (d):

The RCSO provided examples of different inmate PREA educational materials in formats that would be accessible to all inmates in accordance with Title VII of the Americans with Disabilities Act, 42 U.S.C. these formats include, but not limited to: Interpreters for the deaf, reading material to the visually impaired, and providing Interpreters services for non-English speaking inmates.

The RCSO utilizes and contracted with the VOLATIA Language Network in which services are expanded to include in-person, video, and voice translation and/or interpretation. In addition, there are subtitles that is shown during the PREA educational video to ensure all inmates receive the information. The video is also audio for those who are visually impaired or those who may be limited reading skills. The RCSO also provided documentation of versions of their inmate handbook, acknowledgement form, and PREA informational posters in Spanish.

The auditor had an opportunity to observe all the above listed information during the on-site visit and a copy of the memorandum documenting the services provided through the VOLATIA Language line.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency provide inmate education in formats accessible to all inmates, including those who are limited English proficient, Deaf, Visually impaired and limited reading skills. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (e)

The facility utilizes an acknowledgement form that is signed by the inmate and placed in the



inmate's classification file. This information was verified by the auditor while reviewing inmate files during the document review phase of this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency maintains documentation of inmate participation in PREA education sessions. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (f)

The RCSO ensures that information will be continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

The agency has posters strategically posted throughout the facility, in every housing unit, and departments i.e. (kitchen, warehouse) to ensure compliance with PREA standards. Each inmate is also issued a RCSO handbook with relevant information, including PREA educational material. The auditor personally observed these items during the facility site review.

The evidence collected for this provision shows that the agency has procedures in place to ensure that information will be continuously and readily available or visible to inmates. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring PREA inmate education. And training for both volunteers and contractors.

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1414 405">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="252 445 408 479">Documents:</p> <ul style="list-style-type: none"> <li data-bbox="252 517 999 551">a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li data-bbox="252 589 839 622">b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li data-bbox="252 660 946 694">c) RCSO SOI Policy 2.22 Chapter 2 Staff Training</li> <li data-bbox="252 732 1058 766">d) Certificate of Completion by the Rubicon Training Group</li> </ul> <p data-bbox="252 808 379 842">Interview:</p> <ul style="list-style-type: none"> <li data-bbox="252 880 751 913">a) Interview with Investigative staff</li> </ul> <p data-bbox="252 956 515 990">115.34 Provision (a)</p> <p data-bbox="252 1032 1477 1536">RCSO SOI PREA policy 3.33, chapter 3, page 10 states in part that; Investigations of sexual misconduct, sexual contact, sexual abuse, and sexual harassment shall be conducted by an investigator who has experience and training in sexual abuse investigations and appropriate and effective interview techniques. These techniques include interviewing for sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. All sexual abuse and sexual harassment investigators who conduct non-criminal investigations at the jail will receive specialized training. This specialized training is through the Rubicon Training Group. It consists of classroom instruction provided in Salem VA. The facility provided certificates of completion for the classroom course titled, "PREA Investigator Course." The facility identified 25 investigators and provided specialized training certificates of completion for 8 of them.</p> <p data-bbox="252 1579 1469 1736">When interviewing the Investigative staff, the deputy stated that he had received training in 2013 and has also attended additional Internal Affairs Investigator classes. The deputy stated that the classes dealt with the proper use of Garrity and Miranda in criminal cases. The class covered evidence collection and interviewing techniques.</p> <p data-bbox="252 1778 1477 1980">The evidence collected for this provision shows that the agency has procedures in place to ensure that agency investigators receive specialized training inmates receive information explaining how to report sexual abuse and the agency's policy on zero-tolerance for sexual abuse or harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p data-bbox="252 2022 515 2056">115.33 Provision (b)</p> <p data-bbox="252 2098 1445 2132">RCSO SOI PREA policy 3.33, chapter 3, page 10 states in part that; Investigations of sexual</p>

misconduct, sexual contact, sexual abuse, and sexual harassment shall be conducted by an investigator who has experience and training in sexual abuse investigations and appropriate and effective interview techniques. These techniques include:

- Ø Interviewing sexual abuse victims and witnesses
- Ø Sexual abuse scene preservation in a confinement setting
- Ø The criteria and evidence required to substantiate a case for administrative action
- Ø Proper use of Miranda and Garrity warnings
- Ø Criteria and evidence required to substantiate a case for administrative action

During the interview with the investigative staff member he was asked if the training he received included the above listed topics the investigator stated that it did.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all investigators are trained on specific criteria outlined in both the RCSO policy and PREA standard 115.32 provision (b). Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.34 Provision (c)

RCSO SOI Policy 2.22 chapter 2, page 6 states in part that; staff training records shall be kept and maintained by the Agency Training Officer. In addition, the PREA Coordinator also maintains documentation that the agency investigators have completed the required specialized training in conducting sexual abuse and sexual harassment investigations.

The RCSO has provided copies of specialized training records for all staff trained in investigating sexual abuse in a confinement setting. This documentation is in the form of certificates of completion by the Rubicon Training Group "PREA Investigator Course."

The evidence collected for this provision shows that the agency has procedures in place to ensure that all staff responsible for investigating sexual abuse has received additional specialized training. Therefore, through written policy and personal observation by documents provided, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring specialized training for investigators who perform sexual abuse and sexual harassment investigations.

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RSCO Agency Pre-Audit Questionnaire Responses</li> <li>b) RSCO SOI PREA policy 3.33, chapter 3</li> <li>c) Certificate of Completion by the Relias Online Training Modular</li> <li>d) Memorandums dated 4/13/20, 2/5/19, and 1/18/18 from the Agency Training Officer (documenting the completion of the PREA refresher training)</li> <li>e) VA Department of Health Professions copy of Licenses</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with the Director of Medical &amp; Mental Health Staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.35 Provision (a)</p> <p>RSCO SOI PREA policy 3.33 chapter 3, page 14 states impart that; all full and part-time medical and mental health care practitioners who work regularly in the facility will be trained in the following:</p> <ul style="list-style-type: none"> <li>· How to detect and assess signs of sexual abuse and sexual harassment</li> <li>· How to preserve physical evidence of a sexual abuse</li> <li>· How to respond effectively to victims of sexual abuse and harassment</li> <li>· How and to whom to report allegations or suspicions of sexual abuse and harassment</li> </ul> <p>The facility reported there are 32 medical and mental health staff employed with NaphCare and contracted by the RSCO who work regularly and have received the specialized training as required by the agency's policy. During the pre-audit phase, the Auditor was provided copies of certificates of completion showing that medical staff had completed the Relias online courses.</p> <p>When interviewing the Director of the Medical and Mental Health Staff, she informed the Auditor that they had previously received initial training when they first started work and receive annual training. They also received additional training on the above listed topics by going online and taking PREA online classes offered by Relias Training portal.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to</p>

ensure that medical and mental health personnel receive additional training as outlined in this standard. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.35 Provision (b)

The Carilion Roanoke Memorial Hospital performs forensic medical exams for this facility. Medical staff at this facility do not conduct forensic medical examinations. This practice was confirmed during the interview conducted with the Director of the Medical Staff who stated that they do not perform forensic medical examinations. Therefore, this standard is not applicable to the RCSO facility.

The evidence collected for this provision shows that the agency does not perform forensic medical examinations. Therefore, this provision is not applicable to the RCSO.

#### 115.35 Provision (c)

The RCSO relies on the NaphCare Medical Services to maintain the documentation on their personnel that confirms Medical and Mental Health Practitioners have received the training referenced in this standard.

The RCSO has provided copies of specialized training records for medical staff. This documentation is in the form of certificates of completion by the Relias online classes.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical staff has received additional specialized training. Therefore, through written policy and documents provided, the agency has demonstrated that it meets this provision.

#### 115.35 Provision (d)

During the pre-audit phase the facility provided copies of training logs indicating that medical staff receive the same in-service annual PREA training that security staff receives. In addition, while interviewing medical staff the auditor was told that they receive PREA training on a bi-annual basis.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical staff receive(s) the same PREA training that volunteers, contractors, and security staff receive. In addition, they receive this training on a bi-annual basis. Therefore, through written policy and documents provided, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring specialized training for Medical and Mental Health care.

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115.41	<b>Screening for risk of victimization and abusiveness</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 3.05, Chapter 3, Receiving &amp; Admitting Inmates</li> <li>c) RCSO SOI Policy 5.03, Chapter 5, Classification of Inmates</li> <li>d) RCSO SOI PREA Policy 3.33, Chapter 3</li> <li>e) RCSO SOI Policy 3.04 Chapter 3, Release of Information Concerning Inmates</li> <li>f) RCSO PREA Risk Screening Form</li> <li>g) RCSO Medical Screening Form</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff performing Risk Screening</li> <li>b) Interview with Random Inmates</li> <li>c) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.41 Provision (a)</p> <p>RCSO SOI policy 3.05 chapter 3, page 4 states in part that; during the receiving screening process, deputies will identify and monitor arrestees who are at risk for sexually assaultive behavior and those who have been identified at being at risk for sexual victimization. Any arrestee identified during this process will be housed individually while awaiting classification into the jail. Also, all arrestees will be informed and given education of the Sheriff's Office zero-tolerance policy regarding inmate sexual abuse and reporting.</p> <p>During the on-site tour of the facility the auditor sat down with a classification deputy and went through the classification process. The auditor witnessed a recently completed inmate risk-screening questionnaire. Also, during the interviews with 13 random inmates 12 inmates recalled being asked the initial questions such as:</p> <ul style="list-style-type: none"> <li>· Have they been in jail before?</li> <li>· Have they ever been sexually abused?</li> <li>· Did they identify with being LGBT?</li> </ul>

· Did they think they might be in danger of sexual abuse while incarcerated when they first came to jail?

When interviewing the staff responsible for performing the risk screening, the deputy stated that he does conduct risk screening on all inmates during the classification process. However, the Intake Officer completes the initial screening.

The evidence collected for this provision shows that the agency has procedures in place to ensure all inmates receive a risk screening evaluation for the risk of being sexually abused while incarcerated. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (b)

RCSO SOI policy 3.05, pages 4, 6 states in part that; A Classification Officer shall be available on Saturdays and/or holidays to classify inmates in order to ensure that inmates are not housed in the Classification Holding Area for more than forty-eight hours. Classification Process: Under normal circumstances, inmates shall begin the classification process approximately twenty-four hours after being committed to jail. All inmates must complete the classification process before being housed in the general inmate housing area of the jail. The agency reported that they received 3444 inmates into their facility in the last twelve months that had a length of stay more than 72 hours. The agency reports that all those inmates 100% received a risk screening assessment for possible risk of being sexually abused during incarceration.

The agency provided samples of completed risk screening forms during the pre-audit phase and downloaded those documents into the Pre-audit Questionnaire. In addition, during the document review the Auditor observed completed PREA Risk Screening Checklist Instrument forms in the inmate files.

When conducting the interview with staff responsible for performing risk-screening assessments, the deputy stated that he usually conducts the classification process the day the inmate is booked into the facility. However, if the inmate is booked in after 1700 hours the classification staff will conduct the screening the following day and within a 24-hour period. As stated in the previous provision, when interviewing 13 random inmates' 12 inmates reported receiving risk screening within 24-hours of being processed into the jail.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates are screened for the risk of sexual abuse within 72 hours of arrival at the facility. Therefore, through written policy, personal observations, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (c)

The risk screening assessment consists of 11 potential victims 'yes or no questions' and 9 potential aggressors 'yes or no questions.' Each question that is answered by a yes has a number value associated with it. If the yes answers reach a certain number amount, then that



person could be either classified as a potential victim or aggressor. There is no subjectivity to this assessment. Therefore, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (d)

RCSO Agency Risk Screening Tool takes into consideration at the minimum the following:

- Whether the inmate has a mental, physical, or developmental disability
- Age of inmate
- Physical build of inmate
- If the inmate has previously been incarcerated
- If the inmate's criminal history is exclusively nonviolent
- If the inmate has prior convictions for sex offenses
- If the inmate is or perceived to be LGBTQ or gender nonconforming
- If the inmate has previously experienced sexual victimization
- The inmate's own perception of vulnerability
- If the inmate is detained solely for civil immigration purposes

The staff member responsible for performing risk-screening assessments was asked what the risk screening considered and what is the process for conducting these assessments. The deputy stated the assessment asks questions such as has the inmate been sexually abused in the past, prior convicts of sexual assault, and the age and stature of the inmate. The deputy also stated that they use a checklist of yes or no answers to score the assessment. She did state that sometimes she would ask open-ended questions in conjunction with the 'yes and no' questions.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the intake screening shall consider at a minimum the 10 criteria identified in this standard provision. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (e)

The risk screening form utilized by the RCSO classification staff does consider prior acts of sexual abuse, prior convictions for violent offenses, and a history of prior institutional sexual abuse. The staff member responsible for performing risk-screening assessments was asked what the risk screening considered and what is the process for conducting these assessments. The deputy stated the assessment asks questions such as has the inmate been sexually abused in the past, prior convicts of sexual assault, and the age and stature of the inmate.

The evidence collected for this provision shows that the agency has procedures in place to capture and ask the questions listed above surrounding potential aggressor behavior. Therefore, through document review, and interviews conducted, the agency has

demonstrated that it meets this provision.

#### 115.41 Provision (f)

RCSO SOI policy 5.03 chapter 5, page 16 states in part that; Classification of inmates is a continuing process, which begins upon commitment of an inmate into jail and ends when the inmate is released from jail. An inmate's custody level may be increased or decreased as charges and/or behaviors change during the inmate's incarceration. If an inmate is classified due to their risk of sexual abuse (victim or perpetrator) then within a set period of time, not to exceed 30 days, from the inmate's arrival at the facility, the facility will reassess the inmate's risk based upon any additional relevant information received since the intake screening. An inmate's risk level shall 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. During the pre-audit, the facility reported 1542 inmates that entered the facility over the last twelve months that stayed more than 30 days. Out of those inmates 32 were reassessed 30 days after their arrival at the facility for risk of sexual victimization based upon any additional relevant information received since intake over the last twelve months.

The staff members responsible for performing risk-screening assessments was asked how long after arrival are inmates risk levels reassessed. The officer stated within 30 days if additional information arises or if allegations arise. When interviewing 13 random inmates they were asked if staff had ever asked PREA related questions again during their incarceration all 10 stated that they had not and 3 stated that the tablet system reiterates and asks if there has been any changes in their sexual safety.

The evidence collected for this provision shows that the agency has procedures in place to conduct 30-day risk screening reassessments based upon additional or relevant information received by the facility. They also have a tool to attempt to possibly extract additional sexual safety information. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (g)

RCSO SOI policy 5.03 chapter 5, page 16 states in part that; An inmate's risk level shall 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.

When interviewing the staff responsible for conducting risk screening the deputy stated that they do reassess. The deputy provided an example of an inmate that had denied being part of the LGBT community was reassessed due to additional information received that may bear on the inmate's vulnerability.

The evidence collected for this provision shows that the agency has procedures in place to reassess an inmate's risk of sexual victimization due to a referral, request, or additional information. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (h)

RCSO SOI policy 5.03 chapter 5, page 16 states in part that; If the inmate refuses to answer

any of the questions pertaining to prior acts of sexual abuse or history of sexual abuse, that inmate shall not be disciplined for refusal to answer, or not disclosing complete information in response to the questions that are asked pursuant to sexual abuse. In addition, RCSO SOI PREA policy 3.33 chapter 3, page 5 states in part that; inmates may not be disciplined for refusing to answer, or for not disclosing complete information in response to questions asked pursuant to the risk assessment tool.

When interviewing the staff responsible for conducting risk screening the officer stated that the agency does not punish inmates if they chose not to answer the questions associated with the risk screening assessment.

The evidence collected for this provision shows that the agency has procedures in place to prevent inmates from being disciplined for refusing to answer or for not disclosing complete information in response to risk screening. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

115.41 (i)

RCSO SOI policy 3.04 chapter 3, states in part that; only the Sheriff or authorized designees may release information concerning inmates housed in the Roanoke City Jail. In addition, the policy states that; institutional records are confidential records, which are maintained by the jail and are not considered criminal history documents. These records include the classification records.

When interviewing the PREA Coordinator he was asked who has access to the inmates' risk screening information. The Coordinator explained that he had access along with the classification officers and the afterhours watch commander. The PREA Coordinator also stated that the Administrative staff and Booking officers on the weekends. He further stated that no post deputies have access and that the information is kept in the classification office. The staff member responsible for conducting risk screening explained that an Administration, Classification, and Watch Commanders officer has access.

The evidence collected for this provision shows that the agency has procedures in place to control access to the risk screening information collected by the facility and that the information is not exploited. Therefore, through document review and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring screening for risk of victimization and abusiveness.

115.42	<b>Use of screening information</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO SOI 5.03 Chapter 5 Classification of Inmates</li> <li>b) Memorandums dated 07/08/2019 &amp; 03/25/2019 authored by Intake &amp; Classification Manager (Inmates identified as high risk of being sexually abusive)</li> <li>c) Memorandums dated 07/08/2019 authored by Intake &amp; Classification Manager (Inmates identified as at high risk of sexual victimization)</li> <li>d) Memorandum dated 04/14/2020 authored by PREA Coordinator (Separating inmates with high risk of victimization from those with high risk of being sexually abusive)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff performing Risk Screening</li> <li>b) Interview with PREA Coordinator</li> <li>c) Interview with Gay/Lesbian inmates</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.42 Provision (a)</p> <p>RCSO SOI 5.03 chapter 5 page, states in part that; Accurately using a Risk Assessment Tool 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. The PREA Coordinator stated during the interview that risk screening is part of the classification process and that they try to identify possible victims and predators to make sure they are not housed together. The staff member responsible for conducting risk screening stated during his interview that the assessment is used to make sure you identify those inmates that may be vulnerable and those that may be abusive and try to keep them as separate as possible during their incarceration.</p> <p>The evidence collected for this provision shows that the agency uses the information gathered during the risk screening process to influence the decision on where an inmate may be housed, attend programs, and works with the goal of keeping separate those inmates at high risk of being sexually victimized. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.42 Provision (b)</p> <p>RCSO SOI policy 5.03 chapter 5, page 6 states in part that; when making individualized</p>

determinations regarding the safety of each inmate, their sexual identity must be taken into consideration. The decision of where to assign a transgender (a person whose gender identity, internal sense of feeling male or female, is different from the person's assigned sex at birth) or intersex (a person whose sexual or reproductive anatomy or chromosomal pattern does not seem to fit typical definitions of male or female) inmate shall be considered on a case-by-case basis to ensure the inmate's health and safety, as well as whether the placement would present management or security problems. During the interview process the auditor asked the staff member responsible for risk screening how the agency use the information from the risk screening to keep inmates safe. The deputy stated that the information gathered during the screening is to identify who may be a possible victim and who may be a possible aggressor and house those inmates accordingly.

The evidence collected for this provision shows that the agency makes individualized determinations about how to ensure the safety of each inmate. Therefore, through document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (c)

RCSO SOI policy 5.03 chapter 5, page 6 states in part that; when making individualized determinations regarding the safety of each inmate, their sexual identity must be taken into consideration. The decision of where to assign a transgender (a person whose gender identity, internal sense of feeling male or female, is different from the person's assigned sex at birth) or intersex (a person whose sexual or reproductive anatomy or chromosomal pattern does not seem to fit typical definitions of male or female) inmate shall be considered on a case-by-case basis to ensure the inmate's health and safety, as well as whether the placement would present management or security problems.

The PREA Coordinator was interviewed and asked how the agency determines housing and programs for transgender or intersex inmates. The PREA Coordinator stated that he would meet with the inmate and discuss where the inmate would feel safe. Then a group consisting of the PREA Coordinator, Medical, and Mental health professionals would meet to discuss where the best place to house the inmate would be. The PREA Coordinator also stated that the inmate would have full access to all programs.

The auditor interviewed a transgender inmate during the interview process. The transgender inmate was asked if staff asked questions about your safety and the inmate responded yes, they did. The inmate was asked if they had been put in a housing unit only for transgender or intersex inmates and the inmate stated no.

The evidence collected for this provision shows that the agency does consider housing assignments involving transgender and intersex individual on a case-by-case basis. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (d)

RCSO SOI policy 5.03 chapter 5, page 6, states in part that; the placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

The RCSO jail reported not housing a transgender or intersex inmate at their facility over the

last twelve months. When interviewing the staff member responsible for conducting risk screening assessments, he explained that all inmates have a 120-day review and he has not experienced a situation involving a transgender or intersex inmate. The PREA Coordinator also stated that classification reviews are completed on all inmates within 120 days of confinement and transgender inmates are assessed 3 times in the first 3 days. Therefore, there are no examples or experience to relate to as evidence of compliance. However, the agency does have a policy to address this situation when it occurs.

During the interview process with targeted inmates the auditor was interviewing an inmate that the agency identified as being gay. However, during my interview the inmate identified as transgender. The agency was made aware of our conversation.

The evidence collected for this provision shows that the agency has procedures in place to address reassessing a transgender or intersex inmates programming assignment at least twice a year to review any threats or safety concerns. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.42 Provision (e)

RCSO SOI policy 5.03 chapter 5, page 6 states in part that; a transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. When the PREA Coordinator was asked that question, he stated that yes, they do consider the inmates own views when deciding appropriate housing. When the staff member responsible for conducting risk assessment was asked the same question, he responded by stating yes, they take into consideration the individual's opinion. The transgender inmate was asked if staff asked questions about your safety and the inmate responded yes, they did.

The evidence collected for this provision shows that the agency has procedures in place to consider a transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (f)

RCSO SOI policy 5.03 chapter 5, page 6, states in part that; transgender and intersex inmates will be given the opportunity to shower separately from other inmates. The PREA Coordinator and the staff member responsible for conducting risk assessments were interviewed and asked if transgender and intersex inmates are afforded the opportunity to shower separately from other inmates, both deputies stated that yes, they are allowed to shower separately.

The evidence collected for this provision shows that the agency has procedures in place to allow transgender and intersex inmates to shower separately from other inmates. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (g)

RCSO SOI policy 5.03 chapter 5, page 6, states in part that; lesbian, gay, bisexual, transgender, or intersex inmates shall not be placed in dedicated facilities, units, or wings

solely on the basis of such identification or status, unless such placement in a dedicated facility, unit, or wing is established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmate.

During the interview process the PREA Coordinator confirmed that the agency was not under any consent decree, legal settlement, or legal judgment requiring the facility to separate the LGBTQ community from everyone else. The PREA Coordinator stated during his interview that its against policy to segregate those inmates identified as LGBTQ solely on their sexuality. Finally, the Auditor interviewed 2 inmates that identified as LGBT. When asked if they had ever been housed in a unit solely based on their sexuality both inmates stated that they had not.

The evidence collected for this provision shows that the agency has procedures in place to address not placing LGBTQ inmates in designated housing blocks based solely on their sexual orientation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the use of screening information.

<b>115.43</b>	<b>Protective Custody</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 5.03, Chapter 5 Classification of Inmates</li> <li>c) Memorandum dated 04/07/2020 authored by the PREA Coordinator (Identified as high risk of sexual victimization)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Staff who supervise Inmates in Segregation</li> <li>c) Interview with Inmates in Segregation</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.43 Provision (a)</p> <p>RCSO SOI policy 5.03 chapter 5, pages 14, states in part that; inmates who are at a high risk for sexual victimization, or have alleged sexual abuse or misconduct against another inmate may not be placed in involuntary segregation unless an assessment of all available alternative means have been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If such an assessment cannot be conducted immediately, the inmate may be held in involuntary segregated housing for less than 24 hours while assessment is completed.</p> <p>The Warden / Designee stated during his interview that the agency does have a policy prohibiting placing inmates at high risk of sexual victimization in involuntary segregated housing in lieu of other housing areas.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address not using segregated housing for those inmates at high risk of victimization, unless no alternative means of separation is available. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.43 Provision (b)</p> <p>RCSO SOI policy 5.03 chapter 5, page 14, states in part that; These inmates placed in segregated housing due to their sexual victimization shall still retain access to programs, privileges, education, and work opportunities to the extent possible. If these are restricted, it shall be documented:</p>	



- the opportunities that have been limited
- the duration of the limitations and
- the reasons for such limitations.

The agency reported not experiencing an incident where an inmate was placed in segregation based on the high probability of sexual victimization. During the facility tour the auditor visited the special housing unit and reviewed the housing assignments to verify that no inmate was being housed involuntarily due to the risk of being sexually victimized.

The staff member working in segregated housing stated during his interview that if an inmate was placed in segregation based on possible sexual victimization, that inmate would still have access to all the privileges and opportunities that all other inmates would have. He stated that the housing assignment is not seen as a punishment.

The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to the high risk of being sexually victimized that the inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.43 Provision (c)

RCSO SOI policy 5.03 chapter 5, page 15, states in part that; the inmates assigned to involuntary segregation due to being a high risk for sexual victimization shall only be housed in involuntary segregation until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. The agency reported not experiencing an incident where an inmate was placed in segregation based on the high probability of sexual victimization.

The Warden/Designee was interviewed and stated that only if there were no alternatives would an inmate be involuntarily segregated because of the possibility of being sexually victimized. He further stated that if that were the case the inmate's situation would be evaluated every three days by classification. The Warden/Designee explained that at the most an inmate would stay in segregation for no more than 30 days. When the staff member assigned to the special segregated housing unit was asked the same questions, he stated that once an inmate is pulled out of a dangerous situation the inmate can then be reclassified and moved back into population. He also stated that he has no specific example where an inmate was placed in involuntary segregation based on the high risk of victimization.

The evidence collected for this provision shows that the agency has policies in place to ensure that if an inmate is placed in involuntary segregation, such assignment would not exceed 30 days. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.43 Provision (d)

RCSO SOI policy 5.03 chapter 5, page 15 states in part that; if can be made, it shall be documented:

- The basis for the concern for the inmate's safety; and
- The reason why no alternative means of separation can be arranged

The RCSO jail reported not assigning any inmate to involuntary segregated housing for the purpose of separating that inmate due to the high risk for sexual victimization.

The evidence collected for this provision shows that the agency has procedures in place to address documenting the basis for the segregation and why no alternative means of separation could be arranged. Therefore, through written policy, the agency has demonstrated that it meets this provision.

#### 115.43 Provision (e)

RCSO SOI policy 5.03 chapter 5, page 15, states in part that; every 30 days, a review of the housing assignment shall be afforded if there is a continuing need for separation from the general population. The staff member assigned to the special housing unit stated during his interview that classification officers review all inmates that are assigned to segregation once every 30 days.

The evidence collected for this provision shows that the agency has procedures in place to reassess and review an inmate's housing assignment every 30 days to is If there is a continued need for separation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence the PREA Auditor has determined that the agency is fully compliant with this standard requiring limitations on protective custody.

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33</li> <li>c) Inmate Handbook both in English and Spanish</li> <li>d) PREA Poster in both English and Spanish. (3rd Party Outside Reporting) The poster provides the four ways to report sexual abuse and sexual harassment.</li> <li>e) PREA Intake Card</li> <li>f) SMART Tablet &amp; Kiosk Instructions to report Sexual Abuse</li> <li>g) PREA Hotline / Crime Line with the Roanoke City Police to provide outside reporting.</li> <li>h) RCSO Memo dated 04/07/2020 by the Supervisor of the Classification &amp; Intake</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 31 interviews with diverse staff</li> <li>b) 26 interviews with various inmates</li> <li>c) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.51 Provision (a)</p> <p>The agency has provided multiple ways to report a sexual abuse or sexual harassment allegation in a private setting. These reporting options are listed in written policy, confirmed through interviews, and observed through posters and handouts. The Inmate Handbook specifically addresses four ways to report an allegation of sexual abuse or harassment. Those involved making a verbal or written report to any staff member, submitting an Inmate Request Form,(Blue Form), having a 3rd party make a report for the alleged victim, or calling the outside reporting authority promoted by the phone system and dialing (#7732). The contact information and phone number are provided in the handbook. In addition, PREA posters are displayed throughout the facility both in English and Spanish listing the ways an individual can report an allegation of sexual abuse. The staff training curricula consists of classroom instruction at the Law Enforcement Academy and Relias training portal that provides staff ways to report. Those ways are: verbally to any supervisor, PREA Coordinator, submit a written report, or contact the outside reporting agency via hotline. Finally, the agency has</p>

written policy that outlines the four recommended ways to report an allegation of sexual abuse.

During the on-site audit the Auditor performed 31 staff interviews and 26 inmate interviews. To further break down the interviews, they were characterized by 12 random staff interviews, 19 specialized positions, 13 random inmates, and 13 targeted inmates. Of the 31 staff that was interviewed 7 staff members could identify all four ways to report. All 31 staff members could at least identify two ways to report a sexual abuse allegation. Of the 26 inmates that were interviewed, 2 inmates could offer four ways to report sexual abuse, 13 inmates could offer three ways, 9 inmates identified two ways and 2 inmates provided at least one way to report. Every inmate interviewed could name at least one way to report an allegation of sexual abuse.

During the on-site review, the Auditor observed and documented PREA posters posted in both housing units and in public areas throughout the facility. The Auditor requested investigation files that provided documentation of alleged sexual abuse with dispositions. The Auditor contacted Just Detention International and confirmed they had not received any sexual abuse allegations in the last two years.

The evidence collected shows that the facility has provided multiple ways to report sexual abuse or sexual harassment. The evidence also shows that many staff and inmates are aware of those reporting procedures. Confirming the information is being provided. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.51 Provision (b)

The agency has entered into an agreement with the Roanoke City Police Department (RCPD) to provide a phone number that an inmate or staff can call, anonymously if they choose to report allegations of sexual abuse. The phone number is listed in the Inmate Handbook and is automatically prerecorded on the phone service every time an inmate picks up the phone to make a call. This fact was confirmed through the on-site observation. During the facility site review the auditor made a call to the outside agency as a test of the procedure. A member of the RCPD Records Section took the call when the Auditor followed the instructions and was prompted to dial #7732 to make a PREA complaint.

No inmates are housed in this facility solely for civil immigration purposes. Effective September 2019, the Roanoke City Jail no longer houses civil immigration detainees. However, the RCSO may hold foreign nationals due to arrest and does provide those inmates with information on how to contact relevant consular officials and relevant officials at the Department of Homeland

Security. This information is provided in the Inmate Handbook both in English and Spanish. This was confirmed by the agency providing a memorandum dated 04/07/2020 authored by the Classification and Intake Supervisor stating that; The RCSO does not accept or house inmates that are detained solely for civil immigration purposes.

The evidence collected for this provision shows that the agency has provided at least one way for an inmate to report abuse or harassment to a public or private entity not affiliated with the agency. The inmate can also report anonymously if they choose in accordance with the agreement between the RCSO and RCPD. Lastly, the RCSO does not allow the detention of an inmate for the sole purpose of immigration status. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.51 Provision (c)

The agency has a policy under RCSO SOI PREA Policy 3.33 that directs staff to accept all reports of sexual abuse verbally, in writing, anonymously, and from third parties.

When reviewing the investigative files, written reports from deputies documenting verbal allegations were present. During staff interviews the deputies explained that their duties were to immediately write a report recording the verbal sexual allegation. When interviewing inmates, several explained that they would notify a supervisor or security officer. However, there was no clear answer to what the term "immediate" meant. Therefore, it was when the PREA Coordinator was interviewed and asked to define what "immediately" meant according to the protocol. The PREA Coordinator explained that immediately is defined as before the end of the officer's tour of duty for that day. In addition, all the PREA posters displayed throughout the facility states that an allegation of sexual abuse can be reported verbally.

The evidence collected for this provision shows that the agency has demonstrated that they accept and document sexual abuse reports verbally, in writing, and from third parties. It has also been determined that these reports have been handled in a timely fashion. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.51 Provision (d)

The agency provides staff with the outside reporting agency's contact information for the Roanoke City Police crime line. This contact information and phone number can be found in the RCSO's PREA Policy 3.33 along with being posted on the PREA posters located throughout the facility. In addition, the staff are also encouraged to verbally report sexual

abuse or harassment to a supervisor or PREA Coordinator. The contact number for the RCPD Crime Line can be seen on the PREA posters witnessed during the on-site observation tour. It has also been confirmed through staff interviews that they are aware of how to go about privately notifying authorities regarding allegations of sexual abuse or harassment.

The evidence collected for this provision shows that the agency has demonstrated that they do provide staff with a private method of reporting sexual abuse or sexual harassment of inmates. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency provide multiple internal ways for inmates to privately report sexual abuse or sexual harassment. No corrective action is required.

115.52	<b>Exhaustion of administrative remedies</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 1414 403">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="248 445 411 481">Documents:</p> <ul style="list-style-type: none"> <li data-bbox="248 517 999 553">a) RCSI Agency Pre-Audit Questionnaire Responses</li> <li data-bbox="248 589 703 624">b) RCSI SOI PREA Policy 3.33</li> <li data-bbox="248 660 568 696">c) Inmate Handbook</li> <li data-bbox="248 732 1394 806">d) Memorandum dated 04/14/2020 by PREA Coordinator referencing no incidents of reports of sexual misconduct through the grievance procedure</li> </ul> <p data-bbox="248 853 392 889">Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="248 925 887 960">a) Interview with PREA Compliance Manager</li> <li data-bbox="248 996 687 1032">b) Interview with Agency Head</li> </ul> <p data-bbox="248 1077 1110 1113">Observations made during the on-site audit and document review.</p> <p data-bbox="248 1149 1477 1525">The agency has a policy that places limitations on what allegations can be handled through the grievance process. The agency's procedure is that grievances received about sexual assault and sexual harassment will be accepted and reviewed regardless of when the incident took place. The agency protocol is if the grievance director receives a grievance alleging sexual abuse or sexual harassment by staff or sexual abuse by an inmate, the grievance is immediately handed over to the PREA Coordinator or Upper Management for further investigation. The grievance process is immediately stopped and an administrative investigation is immediately initiated. Therefore, this agency is exempt from this standard and not applicable.</p> <p data-bbox="248 1637 515 1673">115.52 Provision (a)</p> <p data-bbox="248 1785 1477 1906">RCSI PREA policy 3.33 chapter 3, page 12 states in part that; grievance about sexual assault or sexual harassment will be accepted and reviewed regardless of when the incident took place.</p> <p data-bbox="248 1942 515 1977">115.52 Provision (b)</p> <p data-bbox="248 2018 1461 2139">RCSI PREA policy 3.33 chapter 3, page 12,14, states in part that; grievance about sexual assault or sexual harassment will be accepted and reviewed regardless of when the incident took place. In addition, page 14 states in part that; There is no requirement for an offender to</p>

use an informal grievance process.

#### 115.52 Provision (c)

The RSCO Inmate Handbook pages 7-8 state in part that; inmates may confidentially disclose incidents of sexual misconduct, sexual contact, sexual abuse, and sexual harassment to any Sheriff's Office employee, either verbally or in writing. Inmates may dial "7732" on the phone located in their pods to report to an outside agency. When they make this phone call, they must state they are calling to make a PREA ALLEGATION. Inmates may also have a family member or friends file a third-party report of sexual misconduct, sexual contact, sexual abuse, and sexual harassment through the Roanoke City Sheriffs Office's website. This process allows for confidential reporting by inmates 24 hours per day, 7 days per week. Such grievances will be handled immediately by the Chief Correctional Officer or Shift Commander during non-business hours. Any inmate who reports an incident of sexual misconduct, sexual contact, sexual abuse, or sexual harassment may request and be treated as an anonymous informant.

#### 115.52 Provision (d)

RSCO SOI policy 3.08 chapter 3, page 3 states in part that; upon receipt of the inmates appeal, the Sheriff or designee will respond to the inmates appeal within 7 days with the first day being the day he/she receives the appeal.

The RSCO received one grievance over the last twelve months that the administrative grievance process was used in regard to appeal the investigative findings of a sexual abuse allegation. However, this grievance process was not utilized to report the alleged sexual abuse, merely to exhaust their administrative due process as it relates to the findings of the PREA investigation.

#### Conclusion

The agency has a policy that places limitations on what allegations can be handled through the grievance process. The agency's procedure is that grievances received about sexual assault and sexual harassment will be accepted and reviewed regardless of when the incident took place. The agency protocol is if the Chief Correctional Officer receives a grievance alleging sexual abuse or sexual harassment by staff or sexual abuse by an inmate, the grievance is immediately handed over to the PREA Coordinator, Upper Management, or assigned to a PREA Investigator for further investigation. The grievance process is immediately stopped, and an administrative investigation is immediately initiated. Therefore, this standard is not applicable in the meaning and purpose for which it is intended. The grievance process is to serve as a vehicle to provide due process in certain situational incidents in a confinement setting and not the purpose of reporting or investigating a sexual abuse allegation in this facility.



115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) RCSO Inmate Handbook both in English and Spanish</li> <li>d) Memorandum of Agreement (MOU) between the RCSO and Sexual Assault Response &amp; Awareness (SARA)</li> <li>e) PREA Poster in both English and Spanish. The poster provides the contact information either by phone or mailing address to a Rape Crisis Center Advocate.</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Inmates who reported a Sexual Abuse</li> <li>b) 26 interviews with various inmates</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.53 Provision (a)</p> <p>The agency has entered into a MOU with SARA of Roanoke to provide outside victim advocacy related to sexual abuse. Stated in that MOU, the Sheriff's Office has agreed to provide telephone numbers and mailing addresses to incarcerated victims who request sexual violence crisis intervention services, emotional support, and/or supportive counseling. SARA services are provided by mail, a phone hotline, and in person upon request. SARA also provides sexual assault educational materials in areas accessible to inmates. The contact information for SAFE is located on the brochures and posters displayed in the housing units. The auditor observed these posters during the facility tour. In addition, the contact information for the Virginia counseling assistance for sexual assault victims can be found in every inmate handbook, which is issue to every inmate upon commitment into the facility. The hotline is free of charge to the inmate and the SAFE phone number is not being recorded by the facility. Outgoing facility mail is not scanned, opened, nor read. The crisis intervention services are confidential, and the crisis center has no duty to report unless involving a juvenile.</p> <p>The agency provided a memorandum date 04/07/2020 from the Intake &amp; Classification Manager that states that the Roanoke City Jail does not hold ICE inmates solely for Civil Immigration purposes effective September 2019.</p>

During the on-site audit, the Auditor performed 26 inmate interviews. 15 inmates were aware that services are available outside the facility for dealing with sexual abuse while in the facility. Three inmates stated that they were not sure and 8 stated that they were not aware of such services. Those inmates that were aware of the services also knew how to contact the crisis center. They were also cognizant that the communication with the crisis advocate is confidential. When asked if they could tell me about the kind of services there are, 13 inmates identified the Blue Ridge Behavior Health Center, one inmate also identified SARA and 2 inmates were unsure. The Auditor also interviewed 1 inmate that reported a sexual abuse while housed in the facility. The inmates stated that the facility did not provide mailing addresses and phone number for outside services until he asked for the information. The inmate stated that when requested the facility provided contact information for SARA of Roanoke.

The evidence collected for this provision shows that the agency has procedures in place to provide crisis intervention services from an outside advocacy group free of charge that is confidential. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.53 Provision (b)

The RCSO informs inmates through a pre-recorded phone message that their calls may be monitored before making every call. The inmate handbook also informs the inmates that their calls are subject to monitoring and may be referred out for investigation. The Auditor performed 26 inmate interviews. The 15 inmates that were aware of these services assumed that the information was confidential. The MOU between the RCSO and SARA states that; any and all information pertaining to the RCSO, RCSO staff and RCSO inmates shall remain confidential.

The evidence collected for this provision shows that the agency does inform inmates the extent to which their communications are being monitored. Therefore, through agency procedures, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.53 Provision (c)

The agency has provided a copy of a MOU between the RCSO and SARA of Roanoke dated 06/26/2017 as proof that confidential emotional support services are being provided to the inmates at the CVRJ. The expiration date for this MOU is indefinite until such time as one or both parties wish to terminate the agreement.

The evidence collected for this provision shows that the agency has entered into a MOU with an outside advocacy group to provide the inmates emotional support as it relates to sexual abuse. Therefore, through the signed MOU and personal observation the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency provide inmate access to outside confidential support services. No corrective action is required.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) Agreement between the RCSO and the Roanoke City Police Department to establish and monitor a PREA Hotline.</li> <li>c) RCSO Agency Website</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.54 Provision (a)</p> <p>The RCSO has entered into an agreement with the Roanoke City Police Department (RCPD) to provide service as an outside reporting designee for the RCSO inmates. The inmates can report by phone 24/7/365 days a year. The RCPD Records Section will take the information received related to a sexual abuse allegation and immediately contact the facility with the information gathered. The inmate or reporting party can remain anonymous upon request. The RCSO also has posters displayed at the entrance of the facility to inform visitors or professional staff on how they can report an allegation of sexual abuse for an inmate housed in the RCSO jail. The Auditor observed these posters during the facility tour. Finally, the agency's website has information posted explaining how someone would report a sexual abuse on behalf of an inmate housed in the RCSO.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address third-party reports of sexual abuse or harassment both formally and publicly. Therefore, through document review and personal observations, the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a method to receive third-party reports alleging sexual abuse and distribute that information publicly. No corrective action is required.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) WellPath Policy &amp; Procedures</li> <li>d) Completed PREA Contractor &amp; Volunteer Agreement</li> <li>e) Assistant Chief Deputy Memorandum dated 08/07/2020 stating that the RCSO has not housed any Youthful Offenders during the prior 12 months.</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 12 Interviews with Random staff</li> <li>b) Interview with Warden or Designee</li> <li>c) Interview with Medical or Mental Health Staff</li> <li>d) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.61 Provision (a)</p> <p>RCSO PREA policy 3.33, chapter 3, page 7 states in part that; “as soon as an incident of sexual contact, sexual abuse or sexual harassment comes to the attention of a staff member or any individual in a position of authority over an inmate (including third-party and anonymous reports), whether or not the incident occurred within this facility, the staff member or contract employee who receives the information shall immediately inform the designated department investigator, Chief Correctional Officer, or Shift Commander.” Staff who received the information must also report any retaliation against inmates or staff who reported such an incident. Failure to do so may result in disciplinary action up to and including dismissal. Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports. In addition, the agency policy states that; Inmates and staff also have the same right to privately or anonymously report retaliation by other inmates or staff for reporting sexual abuse and sexual harassment. Also staff neglect or violation of responsibilities that may have contributed to such incident.</p> <p>During the interview process this Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor.</p>

The evidence collected for this provision shows that the agency has procedures in place to address immediately reporting any knowledge, suspicion, or information regarding sexual abuse or sexual harassment. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.61 Provision (b)

RCSO SOI PREA policy 3.33, chapter 3, page 9, states in part that; Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary as specified in policy to make treatment, investigation, and other security and management decisions.

During the interview process this Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor and must only rely information on a need to know basis.

The evidence collected for this provision shows that the agency has procedures in place to address not revealing information related to a sexual abuse report to anyone other than to the extent necessary. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.61 Provision (c)

Medical Contractor Wellpath Policy & Procedures F-06, page 1, states in part that; Wellpath has a zero-tolerance policy with regard to sexual abuse, sexual harassment, and sexual misconduct. All allegations of sexual abuse, sexual harassment, sexual misconduct with or without consent, or staff voyeurism will be promptly and thoroughly reported to the facility administration and will be handled in compliance with state and federal law.

The Auditor interviewed the Medical and Mental Health Director. The Director stated that they do notify the inmate of the duty to report sexual abuse allegations and the limitations surrounding confidentiality. She also stated that they have a duty to report all suspicions, knowledge, or information regarding sexual abuse. In addition, the Director stated that she had experienced a situation where an alleged sexual abuse allegation had been made and she immediately notified a supervisor.

The evidence collected for this provision shows that the agency has procedures in place to require medical and mental health practitioners to report any incidents they have been made aware of involving the knowledge, suspicion, or information regarding sexual abuse. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.61 Provision (d)

The agency provided a memorandum authored by the Assistant Chief Deputy stating that his facility has not housed any youthful offenders in the last 12 months. In addition, both the PREA Coordinator and Warden/Designee were interviewed and stated that the RCSO has not housed any juveniles or currently house vulnerable adults. The Warden/Designee stated that he would treat the circumstance the same as any other sexual abuse allegation. Because the agency has not experienced this population this provision is not applicable to this facility.

115.61 Provision (e)

RCSO PREA policy 3.33, chapter 3, page 7 states in part that; “as soon as an incident of sexual contact, sexual abuse or sexual harassment comes to the attention of a staff member or any individual in a position of authority over an inmate (including third-party and anonymous reports), whether or not the incident occurred within this facility, the staff member or contract employee who receives the information shall immediately inform the designated department investigator, Chief Correctional Officer, or Shift Commander.”

During the document review the Auditor evaluated 10 investigative files. The files showed that the facility followed these procedures in those cases. The Warden/Designee was also interviewed and explained that all allegations of sexual abuse are assigned to a PREA trained investigator.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all allegations of sexual abuse is turned over to a PREA designated investigator to initiate an inquiry. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring staff and agency reporting duties. No corrective action is required.

115.62	<b>Agency protection duties</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) 4 incident reports of alleged sexual abuse or sexual harassment</li> <li>d) Assistant Chief Deputy Memorandum dated 08/07/2020 stating that the RCSO has not housed any youthful offenders over the past 12 months.</li> <li>e) Chief Deputy Memorandum dated 04/01/2020 stating that there were</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 12 Interviews with Random Staff</li> <li>b) Interview with Warden or Designee</li> <li>c) Interview with Agency Head</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.62 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; As soon as a staff member learns that an inmate is subject to a substantial risk of imminent sexual abuse, they shall take immediate action to protect the inmate. The Pre-Audit Questionnaire response states that inmates are separated immediately in an event of a sexual abuse or sexual harassment allegation. In the last twelve months the agency has reported there have been no incidents where the inmate was deemed a substantial risk of imminent sexual abuse.</p> <p>Interviews were conducted with 12 random staff. Of those staff interviewed, all 12 staff members stated that they would immediately remove the inmate from the situation, block, or housing unit. In addition, they stated that they would conduct an initial inquiry and notify a supervisor. Also interviewed was the Agency Head and Warden/Designee. Both men stated that they would have the inmate immediately removed from the situation and initiate an investigation to collect the facts. Also, that a housing change would immediately take place. Then a Classification officer would re-evaluate the information and determine the best and safest housing assignment moving forward.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address when an inmate is subject to a substantial risk of sexual abuse and immediate action is taken to protect that inmate. Therefore, through written policy, document review, and</p>	



interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring agency protection duties. No corrective action is required.

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <hr/> <p data-bbox="252 327 1414 400">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="252 445 408 479">Documents:</p> <ul style="list-style-type: none"> <li data-bbox="252 517 999 551">a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li data-bbox="252 589 839 622">b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li data-bbox="252 660 1123 694">c) RCSO Reporting to other confinement facilities spread sheet</li> <li data-bbox="252 732 783 766">d) Email notifications to other facilities</li> <li data-bbox="252 804 1129 837">e) Notification received by another confinement facility to RCSO</li> </ul> <p data-bbox="252 882 392 916">Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 954 791 987">a) Interview with Warden or Designee</li> <li data-bbox="252 1025 687 1059">b) Interview with Agency Head</li> </ul> <p data-bbox="252 1104 1110 1137">Observations made during the on-site audit and document review.</p> <p data-bbox="252 1176 679 1209">115.63 Provision (a), (b), and (c)</p> <p data-bbox="252 1247 1123 1281">RCSO SOI PREA policy 3.33 chapter 3, page 14 states in part that:</p> <ol style="list-style-type: none"> <li data-bbox="252 1326 1458 1442">1) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</li> <li data-bbox="252 1480 1458 1554">2) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</li> <li data-bbox="252 1592 807 1626">3) All notifications shall be documented.</li> <li data-bbox="252 1664 1474 1738">4) The superior officer of the department that receives the notification shall ensure that the allegation is investigated in accordance with these standards.</li> <li data-bbox="252 1776 1474 1892">5) If a victim is transferred from a lockup or jail to another jail, prison, or medical facility, the receiving facility shall be informed of the incident and the victim's potential need for medical or social services unless the victim requests otherwise.</li> </ol> <p data-bbox="252 1937 1458 2101">The RCSO reported 13 incidents over the last twelve months where notification was made to another confinement facility about an allegation of sexual abuse. The RCSO has provided a copy of the email exchange between agencies and the generated incident report involving those incidents.</p>

The evidence collected for these provisions shows that the agency has procedures in place to address when an allegation of sexual abuse is received from an inmate, but the incident occurred at a different confinement facility. Therefore, through written policy and document review the agency has demonstrated that it meets these provisions.

#### 115.63 Provision (d)

RCSO SOI PREA policy 3.33 chapter 3, page 14, states in part that; if the RCSO receives an allegation of sexual abuse from an outside confinement facility the superior officer of the department that receives the notification shall ensure that the allegation is investigated in accordance with PREA standards. The RCSO received one alleged sexual abuse allegation from another confinement facility in early 2019. The incident was investigated by a PREA trained investigator with the RCSO.

When the Warden/Designee was interviewed he stated that all contacts are funneled to him when his facility receives an allegation from another facility that an incident of sexual abuse or sexual harassment occurred in his facility. He then directs an administrative investigation to be launched. If it appears to be criminal in nature then the Roanoke City Police are contacted to investigate. The Agency Head/Designee stated that all sexual abuse allegations are directed through the Chief Deputy (Major). If the Chief Deputy is unavailable then contact is made with the on-duty Captain to initiate an administrative investigation.

The evidence collected for this provision shows that the agency has procedures in place to address when an allegation of sexual abuse is received from another agency and when the RCSO makes notification to outside confinement facilities of reported sexual abuse that occurred at said facility. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the reporting to other confinement facilities. No corrective action is required.

<b>115.64</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) Staff First Responder Duties Poster</li> <li>d) Copies of PREA Administrative investigations</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Security Staff First Responders</li> <li>b) Interview with Inmates that reported Sexual Abuse</li> <li>c) 31 Interviews with diverse staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.64 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 7 states in part that; Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond shall be required to:</p> <ul style="list-style-type: none"> <li>Ø Separate the alleged victim and abuser;</li> <li>Ø Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;</li> <li>Ø If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including as appropriate: washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating;</li> <li>Ø If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including as appropriate: washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</li> </ul> <p>As of the date of this report, the facility reported in the last twelve months that 18 inmates reported they were sexually abused. In 12 of those incidents the security staff member was first to respond and immediately separated the alleged victim and abuser; and the security</p>

staff was able to preserve any possible physical evidence at the scene. In 5 cases the sexual abuse allegation was made through the confidential messenger located on the agency issued inmate tablet system. Finally, the last incident involved a written notification on an inmate request form (blue slip) sent to the PREA Coordinator.

An interview with a security staff first responder was conducted. The first responder was asked to describe the actions taken when first on the scene of an alleged inmate sexual abuse allegation. The first responder stated that he would make sure the scene was safe, separate the victim and alleged abuser, report to a supervisor, preserve the evidence, get medical to see them, write a report, and protect the possible crime scene. There was 1 inmate that reported sexual abuse, interviewed during the on-site phase of the audit. The inmate indicated that he sent the notification through the confidential email on the tablet. He stated that staff responded a couple days later, pulled him out of the block and recorded his side of the story. He then stated that his allegations were denied because he was told that camera footage contradicted his allegations. It should be noted that the agency categorized his allegation as a sexual harassment case.

The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of staff first responders when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.64 Provision (b)

RCSO SOI PREA policy 3.33 chapter 3, page 7 states in part that; if the first responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff and appropriate medical/mental health staff. The facility reported no incidents of sexual abuse where the first responder was not a security staff member and the staff member immediately notified security staff.

When conducting interviews, 12 random staff were questioned about their responsibilities when confronted with an allegation of an inmate sexual abuse. The responses were broken down into the following ways. As a side note, the auditor has incorporated the staff's multiple responses into the listed general topics. All 12 staff members stated they would separate the victim and abuser; 11 staff members would also contact a supervisor. Six staff members mentioned contacting medical personnel, 11 staff members cited preserving evidence, 7 staff members said they would secure the scene and 2 staff members stated they would write a report.

The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of non-security staff first responders when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Staff first responder

duties No corrective action is required.

<b>115.65</b>	<b>Coordinated response</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1414 405">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="252 445 411 479">Documents:</p> <ul style="list-style-type: none"> <li data-bbox="252 517 999 551">a) RCSI Agency Pre-Audit Questionnaire Responses</li> <li data-bbox="252 589 839 622">b) RCSI SOI PREA Policy 3.33 Chapter 3</li> <li data-bbox="252 660 826 694">c) Sexual Assault Investigation Checklist</li> <li data-bbox="252 732 767 766">d) WellPath Policy &amp; Procedure F-06</li> </ul> <p data-bbox="252 808 392 842">Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 880 791 913">a) Interview with Warden or Designee</li> </ul> <p data-bbox="252 956 1110 990">Observations made during the on-site audit and document review.</p> <p data-bbox="252 1032 512 1066">115.65 Provision (a)</p> <p data-bbox="252 1108 1481 1400">The RCSI has provided an outlined coordinated response plan in the form of a comprehensive checklist for this facility to follow when confronted with an inmate sexual abuse incident. The document outlines the procedures/steps to follow and includes the actions of the first responders, medical &amp; mental health practitioners, investigators, and facility leadership. In an interview with the Warden/Designee it was confirmed that the agency uses a coordinated response plan to follow when dealing with incidents of alleged inmate sexual abuse. The auditor also observed a completed form from a previous allegation.</p> <p data-bbox="252 1435 1449 1559">The evidence collected for this provision shows that the agency has a coordinated response plan to follow during incidents of alleged inmate sexual abuse. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p data-bbox="252 1597 395 1630">Conclusion</p> <p data-bbox="252 1673 1390 1785">Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a coordinated response. No corrective action is required.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) Code of Virginia 40.1-57.2 (Prohibition against Collective Bargaining)</li> <li>c) Chief Deputy Memorandum dated 07/09/2019 stating how the agency does not participate in collective bargaining</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head or Designee</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.66 Provision (a)</p> <p>Employees in the Commonwealth of Virginia do not have collective bargaining rights per the Code of Virginia 40.1-57.2. There is no collective bargaining agreement entered into since August 2012. This was confirmed by the Auditor during the interview with the Agency Head. In addition, the agency provided a memorandum from the Chief Deputy stating that the RCSO has not entered into or renewed any collective bargaining agreements nor is it part of a union.</p> <p>The evidence collected for this provision shows that this standard is not applicable to this agency or any confinement agency in the Commonwealth of Virginia if it chooses not to engage in collective bargaining. Therefore, through state law and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that this standard is not applicable to this agency. No corrective action is required.</p>



115.67	<b>Agency protection against retaliation</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 3.33 Chapter 3</li> <li>c) PREA Retaliation Monitoring Form</li> <li>d) Copies of PREA Administrative Investigations</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head / Designee</li> <li>b) Interview with Warden / Designee</li> <li>c) Interview with Staff Member charged with Monitoring Retaliation</li> <li>d) Inmate who reported Sexual Abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.67 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 10 states in part that; Sheriff's Office employees, any individual in a position of authority over an inmate or any inmate, detainee, or resident shall not retaliate against the alleged victim, complainant, inmate and/or any witness for making allegations of sexual misconduct, sexual contact, sexual abuse or sexual harassment. Such retaliation may include, but is not limited to: threats regarding parole, bail or probation, denial of privileges, subjection to disciplinary or adverse administrative action, negative comments or recommendations to any parties or organizations, unjustified transfers or unjustified changes in work assignment. No Sheriff's Office employee shall lead the complainant, victim, or witness to believe that such retaliatory actions can or will be taken to induce statements or other cooperation. This in no way shall limit the Roanoke City Sheriff's Office's ability to take appropriate disciplinary or prosecutorial action where inmates make untruthful allegations. The designated staff member charged with monitoring possible retaliation is the PREA Coordinator Master Deputy David Stultz.</p> <p>The evidence collected for this provision shows that the agency has procedures in place and staff to monitor retaliation associated with reports of sexual abuse. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.</p> <p>115.67 Provision (b)</p>

RCSO SOI PREA policy 3.33 chapter 3, page 10 states in part that; If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures shall be taken to protect that individual against retaliation. The Roanoke City Sheriff's Office will provide 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 that fear retaliation for reporting sexual abuse or sexual harassment, or for cooperating with investigations.

The agency has provided several incident reports of alleged sexual abuse or sexual harassment. In those reports the agency employed multiple protection measures. For example, the alleged abuser was immediately moved to different housing, several alleged inmate victims were referred to mental health professionals, the alleged abuser was re-evaluated for suitable housing, and a couple of alleged abusers were reclassified. In addition, both the Agency Head and Warden were interviewed and explained that they could use multiple ways to protect inmates or staff from retaliation. They spoke of changing housing assignments, transfers, providing mental health treatment, and requesting a courtesy hold for the abuser. The staff member charged with monitoring retaliation stated that he monitors the situation, talks to the individuals involved and documents their conversations. He also stated that he encourages the individuals involved to contact him directly if they experience what they believe to be retaliation. When interviewing the inmate that reported sexual abuse he explained that he felt confident that he was being monitored for possible retaliation.

The evidence collected for this provision shows that the agency employs multiple protection measures for those inmates and staff who fear retaliation. Therefore, through document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.67 Provision (c)

RCSO SOI PREA policy 3.33 chapter 3, page 10 states in part that; For a minimum of 90 days following a report of sexual abuse, the conduct and treatment of inmates or staff who reported the sexual abuse and the inmates who were reported to have suffered the sexual abuse shall be monitored by the Professional Standards Unit Lieutenant, or designee (e.g., inmate disciplinary reports, housing, or program changes by inmates, or negative performance reviews or reassignments by staff, etc.) to see if there are changes that may suggest possible retaliation by inmates or staff, and Sheriff's Office personnel shall act promptly to remedy any such retaliation. In the case of inmates, this monitoring shall also include periodic status checks. This obligation to monitor shall terminate if the allegation is unfounded. Any use of restrictive housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of SOI 5.03 – Classification of Inmates.

The Warden / Designee stated that when he suspects retaliation he will immediately initiate an investigation. Based on the findings of that investigation staff may be reassigned or receive discipline up to termination. Inmates can be charged both with in-house charges and criminal prosecution or transferred to a different confinement facility. The staff member charged with retaliation monitoring stated that he monitors individuals for at least 90 days, but will continue to monitor them if he feels it necessary even if and no threat exists. The PREA Coordinator stated that he provides the alleged inmate victim with their rights and his contact information. The PREA Coordinator is copied on all incident reports to include use of force reports. He also

monitors inmate movement and assignments.

The evidence collected for this provision shows that the agency monitors both staff and inmates who have alleged sexual abuse or assisted in the investigation for a minimum of 90 days. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.67 Provision (d)

When conducting the interview with the staff member responsible for monitoring retaliation, he stated that he meets with the alleged inmate victim once a month. At those meetings, the inmate is encouraged to contact him directly if the inmate experiences or believes he or she is being retaliated against in any way. At that time, the inmate may request no further need to them to meet with the PREA Coordinator in person.

The evidence collected for this provision shows that the agency monitors inmates for retaliation periodically. Therefore, through interviews conducted the agency has demonstrated that it meets this provision.

#### 115.67 Provision (e)

RCSO SOI PREA policy 3.33 chapter 3, page 10 states in part that; If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures shall be taken to protect that individual against retaliation. Staff or inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will not be subject to retaliation by other staff or inmates.

The evidence collected for this provision shows that the agency has procedures in place to address protection for other individuals who cooperate with PREA investigations from retaliation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring agency protection from retaliation. No corrective action is required.

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 5.03 Chapter 5, Classification of Inmates</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Staff who supervise Inmates in Segregation</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.68 Provision (a)</p> <p>RCSO SOI policy 5.03, chapter 5, page 15, states in part that; inmates assigned to involuntary segregation due to being a high risk for sexual victimization shall only be housed in involuntary segregation until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. If no other alternative arrangement can be made, it shall be documented:</p> <ul style="list-style-type: none"> <li>a) The basis for the concern for the inmate's safety</li> <li>b) The reason why no alternative means of separation can be arranged</li> </ul> <p>Every 30 days, a review of the housing assignment shall be completed to determine if there is a continuing need for separation from the general population. Any use of protective custody to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements listed above. Over the last 12 months, the agency reported that they had not assigned any inmate who alleged to have suffered sexual abuse to involuntary segregated housing, for the purpose of separating that inmate due to no other housing alternatives. During the facility tour, the Auditor visited the special housing unit and reviewed the cell assignments to verify that no inmate was being housed involuntarily due to alleging sexual abuse.</p> <p>The Warden / Designee stated during his interview that the agency does have a policy prohibiting placing inmates who alleged to have suffered sexual abuse in involuntary segregated housing, in lieu of other housing areas. He also stated that only if there were no alternatives would an inmate be involuntarily segregated because of alleging sexual abuse. He further stated if that were the case the inmate's situation would be evaluated every 3 days by the Classification Section. The Warden / Designee explained that, at most, an inmate would stay in segregation for no more than 30 days.</p>

The staff member working in segregated housing stated during his interview that if an inmate was placed in segregation based on being an alleged victim of a sexual abuse, that inmate would still have access to all the privileges and opportunities that all other inmates would have. He stated that the housing assignment is not seen as a punishment. The staff member also stated that he has no specific example where an inmate was placed in involuntary segregation based on alleging a sexual abuse.

The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to alleging sexual abuse that inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring limitations on protective custody.

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RSCO Agency Pre-Audit Questionnaire Responses</li> <li>b) RSCO SOI PREA Policy 3.33 Chapter 3</li> <li>c) RSCO SOI Policy 5.16 Roles of Consultants and Contract Employees</li> <li>d) Letter of Understanding between the RSCO and Roanoke City Police</li> <li>e) Memorandum dated 12/30/2019 referring to a case being presented for prosecution</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Investigative Staff</li> <li>c) Interview with PREA Coordinator</li> <li>d) Interview with Inmates that reported sexual abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.71 Provision (a)</p> <p>RSCO SOI PREA policy 3.33, chapter 3, page 8, section 15, states in part that; the investigator will conduct thorough and prompt interviews with the complainant, the witnesses, the accused, the alleged victim, and any other individuals who may have information about the alleged incident. All investigations into allegations of sexual abuse and sexual harassment including third-party and anonymous reports will be done promptly, thoroughly, and objectively through the coordinated actions among first responders, medical, and mental health practitioners, investigators, and administration.</p> <p>The Auditor reviewed 10 investigative files during the document review. The average length of investigation for those 10 files were approximately 14 and half days. During the interview with the investigative staff, the investigator stated that an administrative investigation is immediately initiated once notification is made without delay. The investigator stated that anonymous and third-party reports are handled exactly in the same manner as all other sexual abuse allegations.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that it investigates sexual abuse allegations promptly, thoroughly, and objectively. Therefore, through written policy, document review, and interviews conducted, the agency has</p>

demonstrated that it meets this provision.

#### 115.71 Provision (b)

RCSO PREA policy 3.33, chapter 3, page 10, section 23, states in part that; investigations of sexual misconduct, sexual abuse, and sexual harassment shall be conducted by an investigator who has experience and training in sexual abuse investigations and appropriate and effective interview techniques. These techniques include interviewing for sexual abuse victims, proper use of Miranda and 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. The RCSO reported that the agency has 25 PREA certified investigators. During the pre-audit phase, this Auditor requested training records for 8 investigators. The facility provided that information and the Auditor verified that those 8 investigators had received special sexual abuse training in a confinement setting. During the interview process the investigator confirmed that he had received additional training in conducting Internal Affairs investigations.

The evidence collected for this provision shows that the agency has procedures in place to ensure that only specially trained sexual abuse investigators conduct investigations into sexual abuse allegations. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (c)

RCSO SOI PREA policy 3.33 chapter 3, page 9, section 21, states in part that; all staff members will cooperate fully with the investigation into all allegations and will protect and preserve all evidence. Investigators shall 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.

The Auditor reviewed multiple administrative investigations where camera video footage was captured and reviewed to assist in the investigation. The investigation files revealed that alleged victims, suspected perpetrators, and witnesses were interviewed and that prior criminal and institutional records of the individual involved were examined. When conducting the interview with the investigator he stated that he would first collect the officers report and then speak to the officer. Then he would interview the victim, witnesses, and staff. He would then collect any available camera footage. Finally, he would interview the suspected perpetrator and then write his report. The investigator explained that he is responsible for collecting digital video and protecting the crime scene. The Roanoke City Police Department is responsible for collecting direct evidence.

The evidence collected for this provision shows that the agency has procedures in place to ensure that RCSO investigators collect circumstantial evidence and that the Roanoke City Police Department collect direct evidence. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (d)

RCSO SOI PREA policy 3.33 chapter 3, page 9, section 14, states in part that; When the

quality of evidence appears to support criminal prosecution, compelled interviews shall be conducted only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. There are no examples of investigative reports supporting compelled statements. When asked about compelling staff to answer questions the investigator explained that he would go along with the Roanoke City Police Detective to discuss the issue with the Commonwealth Attorney to see if charges would be filed before any compelled interviews would be conducted.

The evidence collected for this provision shows that the agency has procedures in place governing compelled interviews. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (e)

RCSO SOI PREA policy 3.33 chapter 3, page 10, section 25, states in part that; Prisoner witnesses and complainants' credibility shall be evaluated in an unbiased manner in accordance with established investigation methods. The final investigation shall include at a minimum, a narrative of the allegations, a comprehensive listing of factual findings, details of the interviews with all parties and witnesses, and conclusions and recommendations. The final report should conclude with the investigator's final determination of the allegation. In addition, PREA policy 3.33, page 9, section 16, states in part that; A polygraph examination may be used as an investigative tool. It will not be required of an inmate who alleges sexual abuse to submit to a polygraph examination or other truth telling devices as a condition for proceeding with the investigation of such an allegation.

The investigator was interviewed and stated that he takes every allegation the same and handles them in a serious manner. The investigator also stated that polygraphs are not used to determine truthfulness in allegations of sexual abuse. The Auditor also conducted an interview with an inmate that reported sexual abuse. The inmate was asked if the agency required them to take a polygraph as a condition for proceeding with a sexual abuse investigation. The inmate stated no that they did not.

The evidence collected for this provision shows that the agency has procedures in place ensuring that an individual's credibility shall not be determined by the person's status as an inmate or staff. Furthermore, polygraph examinations will not be used as a condition for proceeding with the investigation of a sexual abuse allegation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (f)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 29, states in part that; Administrative investigations shall include an effort to determine whether staff actions or failures to act contributed to the abuse, and shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

A sample of investigative files were reviewed during the document review phase and revealed that all the listed elements for a complete investigation were present in those files. When interviewing the investigator, he stated that to determine if staff actions contributed to a sexual abuse that he would make sure that staff followed policy and agency protocol. He also stated that witness statements, incident reports, circumstantial evidence, and findings would be found



in an administrative investigation file.

The evidence collected for this provision shows that the agency has procedures in place to ensure efforts are made to determine if staff actions or failures contributed to a sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (g)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 30, states in part that; Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. In addition, the RCSO has a Letter of Understanding with the Roanoke City Police Department to conduct all criminal investigations that occur in that facility. The investigator confirmed this practice when asked if his agency conducts criminal investigations. He stated no, any criminal investigation is conducted by the Roanoke City Police Department.

The evidence collected for this provision shows that the agency does not conduct criminal investigations. The Roanoke City Police Department has that responsibility. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (h)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 28, states in part that; Allegations which are substantiated and found to violate Virginia Code 18.2 – 67.4 (1999 Revised, Sexual Conduct Prohibited with Persons Confined), shall be reported to the Commonwealth Attorney's office and will be subject to criminal prosecution.

This provision is the responsibility of the Roanoke City Police Department. Therefore, this provision is not applicable to the RCSO. However, the agency did report that there was one case in the last twelve months that was referred to the Commonwealth Attorneys Office. The Assistant Commonwealth Attorney refused to prosecute at that time citing an uncooperative victim. The investigator confirmed this practice when asked if his agency conducts criminal investigations. He stated no, any criminal investigation is conducted by the Roanoke City Police Department.

The evidence collected for this provision shows that the agency does not conduct criminal investigations. The Roanoke City Police Department has that responsibility. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (i)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 30, states in part that; all written reports of sexual abuse allegations shall be retained for as long as the alleged abuser is incarcerated or employed by the agency plus 5 years. The Auditor reviewed investigative

cases along with additional files provided during the pre-audit phase of this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure written investigative reports are retained for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.

#### 115.71 Provision (j)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 26, states in part that; The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation. The PREA investigator was asked how he would proceed when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation. The investigator explained that he would continue forward as best as possible in the same fashion.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative investigation continues regardless if the abuser or victim is no longer employed or under the agency's control. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.71 Provision (l)

RCSO SOI PREA policy 3.33 chapter 3, page 11, section 27, states in part that; The investigator shall continue the investigation to conclusion, regardless of whether another local, state, or federal agency conducts its own investigation, subject to limitations or restrictions imposed by that agency or the courts. The agency shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements

Interviews were conducted with the Warden/Designee, PREA Coordinator, and Investigative staff about this provision. The PREA Coordinator and Warden/Designee were asked how the agency remains informed of the progress of a criminal sexual abuse case. The PREA Coordinator responded by saying it is usually the Lieutenant in Internal Affairs that works with the Roanoke P.D. and stays informed. The Warden / Designee (Chief Deputy) stated that if the investigation involved staff then communication about the investigation would be handled between the Chief of Police and himself. However, if the investigation involved an inmate on inmate allegation then the supervisor of Internal Affairs would be the point of contact. The Agency Investigator was asked what role he plays in a criminal investigation. The investigator explained that he was the point of contact for setting up all staff and inmate interviews for the Roanoke Police Department and run parallel investigations.

The evidence collected for this provision shows that the agency has procedures in place to try and stay informed about ongoing criminal sexual abuse investigations being conducted by the Roanoke City Police Department. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has

determined that the agency is fully compliant with this standard requiring criminal and administrative agency investigations.

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSI Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSI SOI PREA Policy 3.33 Chapter 3</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Investigative Staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.72 Provision (a)</p> <p>RCSI SOI PREA policy 3.33, chapter 3, pages 11 &amp;12, section 32, states in part that; There will be no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The Agency Investigator was asked what standard of evidence he requires to substantiate allegations of sexual abuse or sexual harassment. The Investigator replied, “the preponderance of the evidence or 51% of the evidence suggests one way or the other.” In addition, the auditor reviewed investigative files and observed case findings.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual assault is substantiated. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring evidentiary standards for administrative investigations.</p>

115.73	<b>Reporting to inmates</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1414 400">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="252 445 408 479">Documents:</p> <ul data-bbox="252 517 999 913" style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33, Chapter 3</li> <li>c) PREA Response Letters</li> <li>d) Resignation Letter</li> <li>e) Main PREA Investigation Log</li> <li>f) Inmate Transfer Documentation</li> </ul> <p data-bbox="252 958 392 992">Interviews:</p> <ul data-bbox="252 1030 983 1211" style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Investigative Staff</li> <li>c) Interview with Inmates that reported sexual abuse</li> </ul> <p data-bbox="252 1249 1110 1283">Observations made during the on-site audit and document review.</p> <p data-bbox="252 1328 515 1361">115.73 Provision (a)</p> <p data-bbox="252 1400 1461 1559">RCSO SOI PREA policy 3.33, chapter 3, page 13, states in part that; Following an investigation into an inmate’s allegation that he or she suffered sexual abuse, the victim shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.</p> <p data-bbox="252 1597 1473 1756">The agency reported 11 investigations of alleged sexual abuse during the last twelve months that were completed by the agency. Of those 11 investigations, the auditor reviewed 6 investigative files and all 6 files contained findings in the form of a PREA response letter given to the inmate and signed by the inmate acknowledging receipt.</p> <p data-bbox="252 1800 1481 2136">During the interview with the investigative staff, the investigator stated that his agency procedures requires him to notify the inmate of the investigative findings. He stated that the finding is put into a response letter that the Sheriff reviews and signs. Then a copy of the letter is given to the alleged inmate victim to sign acknowledging receipt of the findings. The original document is placed in the administrative file. The Warden/Designee stated that yes; notification is made to the inmate as to the findings of his/her allegation. The investigator or PREA Coordinator usually does the notification and the information is also documented in the case file. Lastly, the inmate who reported sexual abuse was interviewed. The alleged inmate</p>

victim stated that he/she had received a response.

The evidence collected for this provision shows that the agency has procedures in place to inform the inmates who allege sexual abuse of the findings of the investigation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.73 Provision (b)

RCSO SOI PREA policy 3.33, chapter 3, page 13 states in part that; If another agency conducts the investigation, the Sheriff's Office shall request relevant information from the investigative agency in order to inform the inmate/victim. In the past twelve months the agency has reported no incidents where an inmate alleged sexual abuse and was investigated and completed by the Roanoke City Police Department.

The evidence collected for this provision shows that the agency has procedures in place to ensure that when an investigation is completed by an outside agency, the inmate is informed of the findings. Therefore, through document review the agency has demonstrated that it meets this provision.

#### 115.73 Provision (c)

RCSO SOI PREA policy 3.33, chapter 3, page 13, states in part that; following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the inmate shall be subsequently informed (unless the agency has determined the allegation is unfounded) whenever:

- The staff member is no longer posted within the inmate's unit.
- The staff member is no longer employed at the facility.
- If it is learned that the staff member has been indicted on a charge related to sexual abuse within the facility.
- If it is learned that the staff member has been convicted on a charge related to sexual abuse within the facility.

The agency has provided a memorandum dated 08/07/2020 from the Chief Deputy stating that there have been no sexual abuse allegations involving staff or inmates that have been referred to criminal prosecution. The inmate interviewed that reported sexual abuse by a staff member case resulted in a finding of unfounded at the conclusion of the investigation.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged staff perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.73 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 13, states in part that; following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever:

- If it is learned that the alleged abuser has been indicted on a charge related to sexual abuse within a facility.
- The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
- All such notifications or attempted notifications shall be documented.
- The obligation to report under this standard shall terminate if the inmate is released from the agency's custody.

The agency has provided a memorandum dated 12/30/2019 from a RCSO PREA Investigator documenting a meeting with an Assistant Commonwealth Attorney discussing a sexual abuse case that had been substantiated by the Sheriff's Office. However, the Commonwealth Attorney's Office declined to prosecute at that time citing an uncooperative alleged victim. The inmate interviewed that reported sexual abuse did not involve another inmate.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged inmate sexual perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.73 Provision (e)

RCSO SOI PREA policy 3.33, chapter3, page 13, states in part that; all notifications and attempted notifications must be documented.

The agency has provided a memorandum dated 08/07/2020 from the Chief Deputy stating that there have been no sexual abuse allegations involving staff or inmates that have been referred to criminal prosecution.

The evidence collected for this provision shows that the agency has procedures in place to ensure all notifications and attempted notifications are documented. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring reporting to inmates.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> </ul> <p>Interviews:</p> <p>Observations made during the on-site audit and document review.</p> <p>115.76 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 11, states in part that; staff shall be subject to disciplinary sanctions up to and including termination for agency sexual abuse or sexual harassment policies.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure staff will be subject to disciplinary actions for violating the agency’s sexual abuse and sexual harassment policies. Therefore, through written policy the agency has demonstrated that it meets this provision.</p> <p>115.76 Provision (b)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 11, states in part that; termination shall be the presumptive disciplinary sanction for staff who has engaged in sexual abuse. There have been no substantiated cases involving staff violating the agency’s sexual abuse or sexual harassment policies and no staff has been terminated based on PREA violations in the past twelve months.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that termination should be the presumptive disciplinary action for staff who have engaged in sexual abuse. Therefore, through written policy agency has demonstrated that it meets this provision.</p> <p>115.76 Provision (c)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 11, states in part that; If other disciplinary sanctions are used for violations of agency policies regarding sexual abuse or sexual harassment (other than actually engaging in sexual abuse), they shall be appropriate with the nature and circumstances of the acts committed, the staff’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p>The agency reported that there have been no staff disciplined for any PREA related allegations associated with sexual abuse or sexual harassment in the last twelve months.</p>



The evidence collected for this provision shows that the agency has procedures in place to discipline staff who violate sexual abuse or sexual harassment policies, but do not engage in sexual abuse. Therefore, through written policy and document review agency has demonstrated that it meets this provision.

115.76 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 11, states in part that; 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, shall be reported to law enforcement agencies unless the activity was clearly not criminal and to any relevant licensing bodies.

The RCSO reported that no staff member has been terminated for PREA policy violations and therefore, no law enforcement agency or licensing bodies contacted.

The evidence collected for this provision shows that the agency has procedures to contact law enforcement and licensing bodies when a staff member is terminated or resigns due to an alleged violation of the agency's sexual abuse or sexual harassment policies. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring disciplinary sanctions for staff. No corrective action is necessary.

115.77	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 5.02, Chapter 5 Citizen Involvement &amp; Volunteer Services</li> <li>c) Memorandum dated 04/06/2020 documenting there were no substantiated allegations of sexual abuse or sexual harassment against volunteers or contractors</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with the Warden/Designee</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.77 Provision (a)</p> <p>RCSO SOI policy 5.02 chapter 5, pages 3,4 states in part that; volunteers may be asked to leave the volunteer program for any of the following reasons:</p> <ul style="list-style-type: none"> <li>· Breach of confidentiality.</li> <li>· Unlawful conduct or breach of departmental rules and regulations.</li> <li>· Physical or emotional illness.</li> <li>· Inability to cooperate with staff.</li> <li>· Any activity which threatens the order or security of the jail or the safety of the volunteer.</li> <li>· Erratic, unreliable attendance.</li> <li>· Engaging in sexual abuse with inmates (which will be reported to law enforcement agencies and relevant licensing bodies by the Chief Deputy or designee unless the activity was not criminal.)</li> </ul> <p>The agency provided a memorandum dated 04/06/2020 stating that there have been no substantiated cases involving contractors or volunteers violating the agency's sexual abuse or sexual harassment policies. Also, no volunteer or contractor has been restricted from contact with inmates based on PREA violations in the past twelve months.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure volunteers or contractors who engage in sexual abuse do not have contact with inmates. In addition, when allegations of sexual abuse are alleged then local law enforcement</p>

is notified. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.

#### 115.77 Provision (b)

RCSO SOI policy 5.02 chapter 5, pages 3,4 states in part that; volunteers may be asked to leave the volunteer program for any of the following reasons:

- Breach of confidentiality.
- Unlawful conduct or breach of departmental rules and regulations.
- Physical or emotional illness.
- Inability to cooperate with staff.
- Any activity which threatens the order or security of the jail or the safety of the volunteer.
- Erratic, unreliable attendance.
- Engaging in sexual abuse with inmates (which will be reported to law enforcement agencies and relevant licensing bodies by the Chief Deputy or designee unless the activity was not criminal.)

The agency provided a memorandum dated 04/06/2020 stating that there have been no substantiated cases involving contractors or volunteers violating the agency's sexual abuse or sexual harassment policies. Also, no volunteer or contractor has been restricted from contact with inmates based on PREA violations in the past twelve months.

The Auditor interviewed the Warden/Designee and he stated that if a contractor or volunteer were accused of violating the agency's sexual abuse or sexual harassment policy, then that individual could no longer stay. If it was determined that the allegation was substantiated, the contractor or volunteer would no longer have access to the facility and the Roanoke City Police Department would be contacted.

The evidence collected for this provision shows that the agency has procedures in place to address actions to be taken when a contractor or volunteer violates agency's PREA policies, but does not engage in sexual abuse of an inmate. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring corrective action for contractors and volunteers. No corrective action necessary.

115.78	<b>Disciplinary sanctions for inmates</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 3.10, Chapter 3, Inmate Rules &amp; Discipline</li> <li>c) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>d) RCSO Incident Reports</li> <li>e) Memorandum dated 12/30/2019 referencing Commonwealth Attorneys demur to prosecute</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with the Warden/Designee</li> <li>b) Medical &amp; Mental Health Staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.78 Provision (a)</p> <p>RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>In the past twelve months the agency has reported that there has been one inmate-on-inmate sexual abuse at the facility that was substantiated. However, the Commonwealth Attorney’s Office refused to prosecute citing an uncooperative victim. Subsequently, the alleged victim did not want to partake in prosecution and alleged that she had a relationship with the suspected abuser on the street. In addition, prior to the completion of the investigation, the suspected abuser was released from the custody of the RCSO and therefore, no in-house charges were brought forward.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates are subject to disciplinary sanctions following a finding that the inmate engaged in inmate-on-inmate sexual abuse. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.</p> <p>115.78 Provision (b) &amp; (c)</p> <p>RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; inmate disciplinary</p>	

sanctions will take in consideration the following:

- Ø The nature and circumstances of the abuse committed
- Ø The inmate's disciplinary history
- Ø The sanctions imposed for similar offenses by other inmates with similar histories
- Ø The inmate's mental disabilities or mental illness

When conducting the interview with the Warden/Designee, he was asked what disciplinary sanctions inmates are subject to following an investigation that found the inmate had engaged in inmate-on-inmate sexual abuse and also, is mental illness considered when determining sanctions? The Warden/Designee stated that the maximum in-house charge could result in 15 days of disciplinary segregation, but the punishment would be determined on the severity of the violation. He also stated that the mental illness part would be considered on the front end, deciding if the inmate should be charged in the first place due to his/her disability.

The evidence collected for these provisions shows that the agency has procedures in place to discipline those inmates who have been found responsible for engaging in inmate-on-inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.78 Provision (d)

RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; Consideration of therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse may lead to the requirement of the offending inmate to participate in interventions as a condition of access to programming or other benefits. In addition, Wellpath policy F-06, Response to Sexual Abuse page 8, states in part that; if the facility identifies an alleged perpetrator of the abuse (through means such as placement in a segregation unit, issuing a disciplinary report, or filing of criminal charges), a mental health staff member will follow up with this individual and assess adjustment to his/her current situation. If the individual is placed in segregation, mental health staff will continue to monitor adjustment issues at least weekly. The staff member assigned to this duty will not be the same person assigned to any ongoing follow-up with the victim of the abuse.

When conducting the interview with the Director of Medical & Mental Health, she was asked if the facility offers therapy, counseling, or other intervention services designed to address and correct the underlying reasons for sexual abuse. The Director stated that they do not offer those services. I confirmed the fact with the PREA Coordinator that all inmates that are housed in segregation, which would initially include an accused sexual abuse aggressor, would be seen by a mental health professional on a weekly basis. However, the RCSO does not offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. But, they would consider providing those services if directed by the courts or recommended by the jail physician.

#### 115.78 Provision (e)

RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; the inmate may be

disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact

The agency did not have an incident of this nature over the past twelve months or longer and therefore no example exists.

The evidence collected for this provision shows that the agency has procedures in place to discipline those inmates who have engaged in sexual abuse against staff members. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.78 Provision (f)

RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct shall not constitute falsely reporting an incident or lying even if an investigation does not establish evidence sufficient to substantiate the allegation. The agency has found many of their investigations as unsubstantiated or unfounded and did not discipline any inmate for bringing those allegations forward in good faith.

The evidence collected for this provision shows that the agency has procedures in place to prohibit those inmates that report sexual abuse or sexual harassment in good faith be disciplined regardless of the investigative findings. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.78 Provision (g)

RCSO SOI PREA policy 3.33 chapter 3, page 12, states in part that; any sexual activity that occurs between inmates is prohibited and shall result in discipline. RCSO prohibits all sexual activity between inmates and will discipline inmates for any such activities. In addition, the RCSO will not deem the activity as sexual abuse if it was not coerced.

The evidence collected for this provision shows that the agency has procedures in place to prohibit any type of sexual activity between inmates and will discipline inmates for those activities. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring disciplinary sanction for inmates. No corrective action necessary.

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI Policy 3.05, Chapter 3, Receiving &amp; Admitting Inmates</li> <li>c) RCSO PREA Policy 3.33, Chapter 3</li> <li>d) Wellpath Policies &amp; Procedures F-06, Response to Sexual Abuse</li> <li>e) Memorandum dated 03/31/2020 documenting an Allegation of Sexual Assault prior to Incarceration</li> <li>f) Mental Health Patient Task (documenting the completion of a visit)</li> <li>g) Medical Informed Consent Forms</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff Responsible for Risk Screening</li> <li>b) Interviews with Medical &amp; Mental Health Staff</li> <li>c) Interviews with Inmates who disclose Sexual Victimization during Risk Screening</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.81 Provision (a) &amp; (c)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 6, states in part that; any inmate who is referred to the medical section because they are identified as being at high risk for sexually assaultive behavior or being at high risk for sexual victimization will be immediately referred for a Mental Health Assessment by the Jail Psychiatrist or other qualified mental health professional.</p> <p>Any inmate (prison or jail) who indicates that that they have experienced prior victimization or previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner. Such inmates will be assessed within 14 days of the referral.</p> <p>In addition, Wellpath policy F-06, Response to Sexual Abuse, page 5, states in part that; all patients will be screened within 14 days of intake for the risk potential and/or history of sexual victimization or abusiveness and need for treatment as a component of the health history and assessment conducted by qualified health care staff. Prior facility health records, when applicable, will be reviewed for evidence of sexual victimization or abusiveness history.</p>

The agency reported that in the past 12 months every inmate that disclosed prior sexual abuse during the screening process was afforded a follow-up meeting with medical or mental health staff.

When conducting the interview with the staff member who is responsible for risk screening he stated that all inmates that are classified have to be medically evaluated and speak with a mental health professional before a housing assignment is generated. He also stated that if an inmate discloses prior sexual victimization during the risk screening process, the classification deputies will send either an e-mail or medical referral to the medical staff to conduct a follow-up meeting. When interviewing those inmates that have reported prior sexual victimization, 3 inmates reported that when they informed staff about their previous victimization a follow-up meeting with a medical or a mental health professional was offered within a day of the notification. One inmate stated that the notification was made via tablet to the watch commander and the last 2 inmates stated that they were not offered any follow-up meeting with medical or mental health. The auditor asked these individuals if they would like for me to arrange a meeting with medical or mental health staff and both inmates declined the offer.

The agency provided documentation of secondary materials i.e. mental health visit documentation, memorandums documenting follow-up visits, and discharge documentation.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization are offered a follow-up meeting with medical or mental health professionals within 14 days of intake. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.81 Provision (b)

This facility is a local Regional Jail holding both pre-trial detainees and sentenced inmates. This facility is not a prison. Therefore, this provision is not applicable to this CVRJ Investigations Policy R-1.05, page 4, facility.

#### 115.81 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 6, states in part 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 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 law. In addition, Wellpath policy F-06, page 4, states in part that; All information related to sexual victimization or abusiveness that occurred in the institutional setting will be strictly limited to health care staff and other staff to inform treatment plans and security/management decisions, as required by federal, state, and local law.

The evidence collected for this provision shows that the agency has procedures in place to ensure that reported sexual victimization that occurred in a confinement setting is strictly limited to selected professionals. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.81 Provision (e)



RCSO SOI policy 3.33, chapter 3, page 6, states in part that; 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.

The Director of both medical and mental health was asked if they obtain informed consent from inmates before reporting about prior sexual victimization. In addition, she was asked how she would handle inmates under the age 18 years old. The Director stated that she would ask for consent and document that on the agency's Medical Informed Consent document. She also stated that she has not encounter any juveniles and therefore she has never experienced that situation. However, the Director is aware of the state of Virginia's mandatory reporting laws involving juveniles.

The agency provided the auditor examples of the signed informed consent documentation used at the facility.

The evidence collected for this provision shows that the agency has procedures in place to ensure informed consent is obtained from inmates before medical and mental health staff can report those incidents if the sexual victimization did not occur in a confinement setting. Therefore, through written policy, document review and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a medical and mental health screening; history of sexual abuse.

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33, chapter 3,</li> <li>c) Wellpath Policy F-06 Response to Sexual Abuse</li> <li>d) Wellpath Policy B-06 Contraception</li> <li>e) Wellpath memorandum dated 03/03/2020 identifying the “Designated Hospital”</li> <li>f) Healthcare Response Forms</li> <li>g) Mental Health Patient Task documentation</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff Responsible for Risk Screening</li> <li>b) Interviews with Medical &amp; Mental Health Staff</li> <li>c) Interview with Inmate who Reported a Sexual Abuse</li> <li>d) Interview with Staff First Responder</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.82 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; Any inmate who has become a victim of sexual assault or harassment 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.</p> <p>The Director of Medical and Mental Health was interviewed and asked if inmate victims of sexual abuse receive immediate and unimpeded emergency medical care and she answered that they do. In addition, she stated that the nature and scope of the treatment is at their professional discretion. The inmate who reported sexual abuse was asked if they had an opportunity to see a medical or mental health doctor/nurse in a timely manner. The inmate stated that yes he/she did but chose not to see one.</p> <p>The agency provided documentation of secondary materials i.e. mental health visit documentation, memorandums documenting follow-up visits, notification of pregnancy tests,</p>

and discharge documentation. The agency has provided examples of these documents as proof of compliance.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization 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. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.82 Provision (b)

RCSO SOI PREA policy 3.33, chapter 3, page 8 states in part that; If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security first responders shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners.

Interviews were conducted with 12 random staff and of those staff interviewed, 11 staff members stated that they would immediately remove the inmate from the situation, block, or housing unit. When interviewing a first responder he explained that he would make the scene safe, report to a supervisor, preserve evidence, contact medical personnel, write a report, and protect the crime scene. If medical personnel are not available then the facility contacts the local rescue emergency services for assistance.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse is offered immediate medical and mental health services when no qualified medical and mental health personnel is available. Therefore, through policy and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.82 Provision (c)

RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the sexually abusive vaginal penetration, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. Treatment services shall be 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. In addition, Wellpath policy F-06 page 7, states in part that; Prophylactic treatment and follow-up care for sexually transmitted or other communicable diseases (e.g. HIV, Hepatitis B) are offered to all victims, as appropriate.

The RCSO utilizes the services provided by the Carilion Roanoke Memorial Hospital Forensics Unit to provide these services. The interview with the SANE Nurse specifically outlined that the Carilion Forensics Unit will offer information, timely access to emergency contraception and sexually transmitted infections prophylaxis.

When conducting interviews with medical and mental health staff it was disclosed that yes, the SANE Nurse at the Carilion Roanoke Hospital Forensics Unit offers it.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates are offered information and access to emergency contraception and sexually transmitted infections prophylaxis after allegations of sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.82 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; treatment services shall be 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.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse do not incur any financial responsibility due to a sexual abuse allegation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring access to emergency medical and mental health services.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1414 405">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="252 445 408 479">Documents:</p> <ul style="list-style-type: none"> <li data-bbox="252 517 999 551">a) RCSI Agency Pre-Audit Questionnaire Responses</li> <li data-bbox="252 589 847 622">b) RCSI SOI PREA Policy 3.33, Chapter 3</li> <li data-bbox="252 660 1185 694">c) Wellpath Policies &amp; Procedures, F-06, Response to Sexual Abuse</li> <li data-bbox="252 732 922 766">d) Memorandum identifying Designated Hospital</li> <li data-bbox="252 804 798 837">e) Forensic Nursing / Carilion Hospital</li> </ul> <p data-bbox="252 882 392 916">Interviews:</p> <ul style="list-style-type: none"> <li data-bbox="252 954 922 987">a) Interviews with Medical &amp; Mental Health Staff</li> <li data-bbox="252 1025 1007 1059">b) Interview with Inmate who Reported a Sexual Abuse</li> </ul> <p data-bbox="252 1104 1110 1137">Observations made during the on-site audit and document review.</p> <p data-bbox="252 1176 587 1209">115.83 Provision (a) &amp; (b)</p> <p data-bbox="252 1247 1474 1503">RCSI SOI PREA policy 3.33, chapter 3, page 6 &amp; 8, states in part that; Any inmate who has become a victim of sexual assault or harassment 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. Also, page 8 states in part that; The evaluations and treatment of such victims shall include, as appropriate:</p> <ul style="list-style-type: none"> <li data-bbox="252 1541 533 1574">Ø Follow up services</li> <li data-bbox="252 1612 507 1646">Ø Treatment plans</li> <li data-bbox="252 1684 1445 1762">Ø Referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody</li> </ul> <p data-bbox="252 1800 1484 2056">The interviews conducted revealed that medical staff would not take the lead on treatment and would consult with the SANE Nurse. The Medical Director stated that the treatment should be individualized based on the type of injury. The mental health professional stated that he had not experienced this situation. However, the Community Services Board would always be offered to provide continued care. The one inmate interviewed who reported sexual abuse did not require continued care.</p> <p data-bbox="252 2094 1433 2128">The evidence collected for this provision shows that the agency has procedures in place to</p>

ensure the facility offer medical and mental health evaluation and treatment to all inmates who have been sexually victimized. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.83 Provision (c)

RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; medical and mental health services should be consistent with the community level of care.

An interview was conducted with the Medical & Mental Health Director. That interview revealed that the Director believes that the service is better due to the immediate access. Also, the contracted medical care services include and provides the mental health services provided in the Jail, The Community Services Board offers services for the community.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates receive medical and mental health services consistent with the community level of care. Therefore, through interviews conducted the agency has demonstrated that it meets this provision.

#### 115.83 Provision (d) & (e)

RCSO SOI PREA policy 3.33, page 8, states in part that; inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the sexually abusive vaginal penetration, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services. There have been no incidents of this nature at this facility over the last twelve months.

The RCSO has entered into procedural MOU with the Roanoke City Police to conduct all criminal investigations to include sexual assault. The Roanoke Police Department utilizes the Carilion Roanoke Hospital Forensic Nursing Unit to provide these services. The interview with the SANE Nurse confirmed that the Carilion Forensics Unit will offer information, timely access to emergency contraception, and prophylaxis treatment for sexually transmitted infections.

When conducting an interview with the Director of the Medical and Mental Health staff it was revealed that the SANE Nurse at the Carilion Roanoke Hospital Forensics Unit offers this service. In addition, the facility agrees to make the inmate available for further future appointments with the Carilion Hospital Forensics Unit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of vaginal penetration are offered pregnancy tests along with timely information about access to all lawful pregnancy-related medical services. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.83 Provision (f)

RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. Treatment services shall be 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. There have been no incidents of this nature at this facility over the last twelve months.

The RCSO has entered into procedural MOU with the Roanoke City Police to conduct all criminal investigations to include sexual assault. The Roanoke Police Department utilizes the Carilion Roanoke Hospital Forensic Nursing Unit to provide these services. The interview with the SANE Nurse confirmed that the Carilion Forensics Unit will offer information, timely access to emergency contraception and prophylaxis treatment for sexually transmitted infections.

When conducting an interview with the Director of the Medical and Mental Health staff it was revealed that the SANE Nurse at the Carilion Roanoke Hospital Forensics Unit offers this service. In addition, the facility agrees to make the inmate available for further future appointments with the Carilion Hospital Forensics Unit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of sexual abuse is offered tests for sexually transmitted infections as appropriate. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.83 Provision (g)

RCSO SOI PREA policy 3.33, chapter 3, page 8, states in part that; all treatment services for sexual abuse will be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse do not incur any financial responsibility due to a sexual abuse allegation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring ongoing medical and mental health care for sexual abuse victims and abusers.

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33, chapter 3</li> <li>c) Sexual Abuse Review Committee's Reports (SAIRT)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with the Warden/Designee</li> <li>b) Interview with the PREA Coordinator</li> <li>c) Interview with the Incident Review Team Member</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.86 Provision (a) &amp; (b)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 13 states in part that; Within 30 days of the conclusion of any substantiated or unsubstantiated sexual abuse investigation, a sexual abuse incident review shall be conducted. The facility reported 9 SAIRT reviews in the past twelve months. All reviews were of administrative investigations that resulted in a SAIRT incident review. All incident reviews were documented and provided as evidence of compliance for these provisions. After reviewing the documentation, the review was conducted and completed within the 30-day timeline after the conclusion of the investigation.</p> <p>The evidence collected for these provisions shows that the agency has procedures in place to ensure that an incident review is conducted after every sexual abuse investigation exuding those that are unfounded. In addition, the incident review shall occur within 30 days of the conclusion of the investigation. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.86 Provision (c)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 13, states in part that; The review team shall include, but are not limited to the Chief Deputy (or designee), Chief Correctional Officer (or designee), Chief Support Services Officer (or designee), an Investigator, Medical Representative, and PREA Coordinator (or designee). These members are suggested for the Incident Review Team and it may also include any party that the Sheriff deems necessary.</p> <p>The agency provided 5 of the 9 SAIRT incident reviews as proof of a team consisting of a Medical or Mental Health Practitioner, the PREA Coordinator, the Chief Correctional Officer,</p>



and the (Chief Deputy or Assistant Chief Deputy).

In the interview with the Warden/Designee he stated that the agency does utilize an incident review team and the input from these individuals are considered, and many times part of the team review, depending on the situation. He also stated that the investigator is not part of the review team, however, other investigators are included.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the review team is made up of upper level management, supervisors, investigators, and medical/mental health staff. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

115.86 Provision (d) & (e)

RCSO SOI PREA policy 3.33, chapter 3, page 13 states in part that; the purpose of the Incident Review Team will be to:

- Ø Consider whether the allegation/investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
- Ø Consider what motivated the allegation/incident, whether it was race, ethnicity, gender identity, sexual preference, group dynamics, etc.
- Ø Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
- Ø Assess the adequacy of staffing levels in that area during different shifts.
- Ø Assess whether monitoring technology should be deployed or augmented to supplement supervisions by staff.
- Ø Prepare a report of findings and any recommendations for improvement.

The recommendations for improvement, if any were found, shall be implemented, or document the reasons for not doing so.

The facility provided evidence of five 30-day incident review meeting minutes that suggests this practice was followed. In those minutes, the review team disagreed with the investigators findings in one case and changed the conclusion from an unsubstantiated finding to a finding of substantiated.

Interviews with the Warden/Designee, Incident Review Team Member, and PREA Coordinator all revealed that these topics are considered and discussed during the review. The agency uses a form incident review document that prompts the team to discuss and document each specific topic when the meeting takes place.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the incident review team considers all the above listed criteria when convening their meetings. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring sexual abuse incident reviews.

<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RSCO Agency Pre-Audit Questionnaire Responses</li> <li>b) RSCO SOI PREA Policy 3.33, Chapter 3</li> <li>c) Main PREA Investigation Log</li> <li>d) Copies of the last three years of the RSCO PREA Annual Report</li> </ul> <p>Interviews:</p> <p>Observations made during the on-site audit and document review.</p> <p>115.87 Provision (a) &amp; (c)</p> <p>RSCO SOI PREA policy 3.33, chapter 3, pages 14 &amp; 15, states in part that; the Jail will annually collect accurate uniform data for every allegation of sexual misconduct necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice (DOJ).</p> <p>The facility reported that their collection instrument is based directly off the SSV. The facility also provided the “Main PREA Investigation Log” documenting those characteristics necessary to complete and document the information relied upon to complete the SSV for the DOJ, Bureau of Justice Statistics.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to collect accurate uniform data for every allegation of sexual abuse. The data collected is used to complete the federal mandated Survey of Sexual Violence questionnaire. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.87 Provision (b)</p> <p>RSCO SOI PREA policy 3.33, chapter 3, pages 14 &amp; 15, states in part that; the incident-based sexual misconduct data shall be aggregated annually. The 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.</p> <p>The facility has provided the last six years’ worth of PREA annual reports containing comparisons of the current years data and corrective actions from the previous years’ assessment of the agency’s progress.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to</p>

ensure that the agency will aggregate the incident based sexual abuse data annually. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.87 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; all data shall be maintained, reviewed, and collected as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. All such data, upon request, from the previous calendar year shall be provided to the Department of Justice no later than June 30.

The facility has provided the "Main PREA Investigation Log" containing the collected data used to complete and submit the SSV for the Department of Justice Bureau of Justice Statistics.

The evidence collected for this provision shows that the agency has procedures in place to maintain, review, and collect data ensure that the incident review team consider all the above listed available incident-based documents. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.87 Provision (e)

This provision is not applicable to this facility because the agency does not contract for the confinement of its inmates.

#### 115.87 Provision (f)

RCSO SOI policy 3.33, chapter 3, page 15, states in part that; all such data, upon request, from the previous calendar year shall be provided to the Department of Justice no later than June 30.

The facility has provided the "Main PREA Investigation Log" containing the collected data used to complete and submit the SSV for the Department of Justice, Bureau of Justice Statistics.

The evidence collected for this provision shows that the agency has procedures in place to submit their annual SSV report to the Department of Justice. However, the agency has not been requested by the DOJ to provide this information at this time or in prior two years. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Data Collection.

<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33 Chapter 3</li> <li>c) Copies of the last four years of the PREA Annual Report</li> <li>d) Copies of the last four years of the Sheriff's approval of the PREA Annual Reports</li> <li>e) The Roanoke City Sheriff's Office Jail Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head</li> <li>b) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.88 Provision (a)</p> <p>RCSO SOI policy 3.33, chapter 3, page 15, states in part that; the data that is collected and aggregated shall be reviewed in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices and training, including:</p> <ul style="list-style-type: none"> <li>Ø Identifying problem areas</li> <li>Ø Taking corrective action on an ongoing basis: and</li> <li>Ø Preparing an annual report of its findings and corrective actions for the Jail as a whole</li> </ul> <p>The facility has provided the last four years of their PREA Annual Report as evidence to support compliance with this provision. The reports include all of the above elements outlined in this provision, specifically, under the annual accomplishments and recommendation portions of the annual reports.</p> <p>Interviews conducted with the Agency Head and PREA Coordinator confirmed that an annual report is generated to assess and improve the effectiveness of the agency's prevention, detection, and response to sexual abuse. The PREA Coordinator stated that the report was used to justify additional cameras throughout the facility.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to review data collected to better assess and improve the effectiveness of its sexual abuse policies. Therefore, through written policy, document review, and interviews conducted, the</p>

agency has demonstrated that it meets this provision.

#### 115.88 Provision (b)

RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; such report shall include a comparison of the current year's data and corrective actions with those from the prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

The facility has provided the last four years worth of PREA annual reports containing comparisons of the current years data and corrective actions from the previous years assessment of the agency's progress.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency provides prior year comparisons in its yearly PREA annual report. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.88 Provision (c)

RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; the approved (by agency head) annual report will be readily available to the public annually through its website. All personal identifiers will be removed before making sexual misconduct data publicly available.

The facility has posted the last six years of PREA Annual Reports on their website. This is a public website that provides access to those reports. The PREA Coordinator produces an approval for the PREA Annual Report memorandum, which the Sheriff must sign off on the report, prior to publication. This procedure is corroborated by the evidence provided of the last four memos generated with the signature of the Sheriff present on the memorandum.

During the interview with the Agency Head he confirmed, that yes, he must have final approval before making the document public.

The evidence collected for this provision shows that the agency has procedures in place to make the PREA Annual Report public by posting to their website and that the Sheriff must have final approval. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.88 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; the agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the Jail, but must indicate the nature of the material redacted.

The facility reported that the only information redacted from the annual reports are the names of the individuals involved and that there has been no material redacted. The PREA Coordinator stated during his interview that only personal identifiers and threats to safety and security would be the only reasons to redact information from the PREA Annual Report.

The evidence collected for this provision shows that the agency has procedures in place to redact only specific information from the PREA Annual Report. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Data review for corrective action.

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) RCSO Agency Pre-Audit Questionnaire Responses</li> <li>b) RCSO SOI PREA Policy 3.33, Chapter 3</li> <li>c) Copies of the last six years of RCSO PREA Annual Reports</li> <li>d) The Roanoke City Sheriff’s Office Jail Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.89 Provision (a)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; the agency ensures that the incident-based and aggregate data are securely retained. The sexual misconduct data collected is maintained for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise.</p> <p>The PREA Coordinator was interviewed and asked how the agency ensures that the data collected is securely retained. The Coordinator stated that all hardcopies of files, investigations, and reports are kept in the Professional Standards Unit office in a locked filing cabinet. Only the Supervisor of this section has access to this cabinet. In addition, all electronic files are kept on a server that only the Supervisor of the Professional Standards Unit, PREA Coordinator, and Chief Deputy has access to.</p> <p>The evidence collected for this provision shows that the agency has a procedure in place to secure collected data regarding sexual abuse allegations. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.89 Provision (b) &amp;(c)</p> <p>RCSO SOI PREA policy 3.33, chapter 3, page 15 states in part that; the Agency Head will make the report readily available to the public through the agency’s website. All personal identifiers will be removed before making sexual misconduct data publicly available.</p> <p>The facility has posted the last six years of PREA Annual Reports on their website. This is a public website that provides access to those reports. These reports can be viewed by going to the agency’s website.</p>



The evidence collected for this provision shows that the agency has procedures in place to make the PREA Annual Report public by posting to their website and that all personal identifiers are redacted prior to publication. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

115.89 Provision (d)

RCSO SOI PREA policy 3.33, chapter 3, page 15, states in part that; the sexual misconduct data collected is maintained for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise. The Auditor has reviewed historical sexual abuse information during this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure sexual abuse data is retained for at least 10 years after the date of the initial collection. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring data storage, publication, and destruction. No corrective action necessary.

115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This is the Roanoke City Jail's third PREA Audit. The initial audit was conducted in August of 2014. At that time, the facility met 32 PREA standards, exceeded in 8 standards and 3 standards were not applicable. There was no corrective action necessary during the 2014 audit. The second PREA Audit was conducted in July of 2017. At the conclusion of that audit, the facility met 41 standards and 2 standards were not applicable.</p> <p>The Auditor was provided full access to and observed all areas of the facility without obstruction. The Auditor received all requested documents or copies of relevant materials. The Auditor was also permitted to conduct all interviews in a private setting with both inmates and staff. Finally, the inmates were permitted to send the Auditor confidential correspondence in the same manner that legal mail would be handled. This topic was discussed and documented prior to the audit.</p>

115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	The Roanoke City Sheriff's Office has posted both the 2014 and 2017 PREA Audits on their website. Therefore, evidence would suggest that this would happen once again after receiving the 2020 PREA audit final report.

<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure 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.)	na
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for	yes

	adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	
	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 consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes

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

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual	yes



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

<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes

<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	no
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes



<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
<b>115.33 (f)</b>	<b>Inmate education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (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 sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

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

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

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



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

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

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

<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	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
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	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
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	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
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	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.)	na
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	na

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.)	na
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	na
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	na

<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	na
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na

<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes



<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of 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?	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 any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations 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).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes

<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes



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

<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes

<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant 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?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes



<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	no
	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.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes