

# PREA Facility Audit Report: Final

**Name of Facility:** East Moline Correctional Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 11/14/2023

**Date Final Report Submitted:** 05/17/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Kendra Prisk	<b>Date of Signature:</b> 05/17/2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Prisk, Kendra
<b>Email:</b>	2kconsultingllc@gmail.com
<b>Start Date of On-Site Audit:</b>	10/02/2023
<b>End Date of On-Site Audit:</b>	10/03/2023

FACILITY INFORMATION	
<b>Facility name:</b>	East Moline Correctional Center
<b>Facility physical address:</b>	100 Hillcrest Road, East Moline, Illinois - 61244
<b>Facility mailing address:</b>	

Primary Contact
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<b>Name:</b>	Ryan Nottingham
<b>Email Address:</b>	ryan.nottingham@illinois.gov
<b>Telephone Number:</b>	217-558-2200

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	John Varga
<b>Email Address:</b>	john.varga@illinois.gov
<b>Telephone Number:</b>	309-755-4511

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Nicole Genisio
<b>Email Address:</b>	nicole.genisio@illinois.gov
<b>Telephone Number:</b>	
<b>Name:</b>	Yvonne Jaquet
<b>Email Address:</b>	yvonne.jaquet@illinois.gov
<b>Telephone Number:</b>	

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Melissa Baker
<b>Email Address:</b>	melissa.baker@illinois.gov
<b>Telephone Number:</b>	309-755-4511

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	1383
<b>Current population of facility:</b>	473
<b>Average daily population for the past 12 months:</b>	414

<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>	Males
<b>Age range of population:</b>	19-80
<b>Facility security levels/inmate custody levels:</b>	Minimum
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	284
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	48
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	18

### AGENCY INFORMATION

<b>Name of agency:</b>	Illinois Department of Corrections
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	1301 Concordia Court, Springfield, Illinois - 62794
<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>	Ryan Nottingham	<b>Email Address:</b>	ryan.nottingham@illinois.gov

## Facility AUDIT FINDINGS

### Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
1	<ul style="list-style-type: none"> <li>115.12 - Contracting with other entities for the confinement of inmates</li> </ul>
Number of standards met:	
44	
Number of standards not met:	
0	

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-10-02
2. End date of the onsite portion of the audit:	2023-10-03

#### Outreach

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

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1383
15. Average daily population for the past 12 months:	414
16. Number of inmate/resident/detainee housing units:	6
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	497
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	5
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	41
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	10
<b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	7

<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>3</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>6</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>191</p>
<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>28</p>

<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>56</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>No text provided.</p>
<p><b>INTERVIEWS</b></p>	
<p><b>Inmate/Resident/Detainee Interviews</b></p>	
<p><b>Random Inmate/Resident/Detainee Interviews</b></p>	
<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>13</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p> <input checked="" type="checkbox"/> Age  <input checked="" type="checkbox"/> Race  <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)  <input checked="" type="checkbox"/> Length of time in the facility  <input checked="" type="checkbox"/> Housing assignment  <input checked="" type="checkbox"/> Gender  <input type="checkbox"/> Other  <input type="checkbox"/> None </p>
<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>The auditor ensured a geographically diverse sample among interviewees. The following IICs were selected from the housing units: three from AD1, one from AD2, three from AD3, five from AD5, four from U2B, four from U2C, four from U2D and two from U3.</p>



<p><b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>All 26 IICs interviewed were male, fifteen were black, six were white and four were Hispanic. With regard to age, one was between eighteen and 25; nine were 26-35; twelve were 36-45 and four were 46-55. 22 of the IICs interviewed were at the facility less than a year and four were there between a year and five years.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>13</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p><b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor handbook advises that at least one disabled IIC is required to be interviewed from hearing, vision and physical. The auditor interviewed two hearing impaired IICs.</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor handbook advises that at least one disabled IIC is required to be interviewed from hearing, vision and physical. The auditor interviewed two hearing impaired IICs.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>

<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor reviewed risk screening documents and spoke with mental health staff and other IICs.</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>3</p>

<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>2</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The auditor reviewed housing assignments of the high risk lists and those who reported sexual abuse.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>13</p>

<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>If "Other," describe:</b></p>	<p>Gender, Race and Ethnicity</p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>Security staff mainly make up three shifts, first shift works from 7am-3pm, second shift works from 3pm-11pm and third shift works from 11pm-7am. Six staff were interviewed from first shift, three were from second shift and four were from third shift. With regard to the demographics of the random staff interviewed; nine were male and four were female. Twelve were white and one was Hispanic. Seven were Correctional Officers, three were Sergeants, one was a Lieutenant and two were Majors.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>27</p>

<b>76. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

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



<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.
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**SITE REVIEW AND DOCUMENTATION SAMPLING**

**Site Review**

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<b>84. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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**Was the site review an active, inquiring process that included the following:**

<b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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**88. Informal conversations with staff during the site review (encouraged, not required)?**

Yes

No

**89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).**

The on-site portion of the audit was originally scheduled for March 2023, however due to unforeseen circumstances the audit had to be rescheduled to October 2023. The original PAQ numbers were from the twelve months prior to the March 2023 date, however the auditor requested updated numbers for the October 2023 date. These numbers are included in the appropriate standards. The onsite portion of the audit was conducted on October 2-3, 2023. The auditor had an initial briefing with facility leadership and discussed the audit logistics. After the initial briefing, the auditor selected individuals in custody (IICs) and staff for interview as well as documentation to review. The auditor conducted a tour of the facility on October 2, 2023. The tour included all areas associated with the facility to include; housing units, laundry, warehouse, intake, visitation, chapel, maintenance, education, vocation, food service, health services, recreation, grounds, caustics, clothing, commissary, front entrance and administration. During the tour the auditor was cognizant of staffing levels, video monitoring placement, blind spots, posted PREA information, privacy for IICs in housing units and other factors as indicated in the appropriate standard findings.

The auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or

grievance, by writing to the PREA Coordinator or by sending privileged mail to the John Howard Association. The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. In addition to the Posters, housing units had the PREA Hotline number painted in the housing units. Informal conversation with staff and IICs confirmed that the PREA information has been posted for a while. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only poster with information on the outside reporting entity and the contact information for the victim advocacy service.

Third party reporting information was observed in visitation via the PREA Poster. The PREA Poster was observed in English and Spanish on legal size paper. The facility does not have a front entrance and IICs and the public do not have access to the administration area.

During the tour the auditor confirmed the facility follows the staffing plan. There was at least one security staff per housing unit. Additionally, there were zone supervisors (Lieutenants and Sergeants) across different zones of the facility. Program, work and education areas included non-security staff and either a positioned or roving security staff member. In areas where security staff were not directly assigned, routine security checks were required. The auditor confirmed that the physical plant of the housing units provided an adequate line of sight in conjunction with routine security checks/rounds. The facility did not appear to be overcrowded and staffing appeared to be adequate based on the population. The auditor identified numerous blind spots due to the age of the facility

including in the laundry areas in the housing units, in facility laundry, in the warehouse and in vocation (regular and construction). The facility had very limited video monitoring technology but they did have a few mirrors in spaces to alleviate blind spots. The facility staff indicated they have had the video monitoring technology available since 2020 but they have not had someone to install the equipment. Informal conversation with staff and IICs indicated staff conduct rounds every 30 minutes, at minimum, and they see a supervisor (Lieutenant) at least once a day.

During the tour the auditor observed the facility had video monitoring technology in two areas. Cameras were not actively monitored and were mainly utilized to assist with investigations. Cameras are remotely monitored/viewed by Internal Affairs, Shift Commanders and administrative staff.

During the tour the auditor observed that IICs have privacy when showering and using the restroom via curtains and doors. Search areas also provided privacy through doors and barriers. With regard to the opposite gender announcement, the auditor heard the announcement made verbally upon entry into a few of the housing units. The auditor observed that the announcement was inconsistent and was not a routine process. The agency also has a paging system for the deaf and hard of hearing IICs where the announcement can be sent out to their watches. Informal conversation with IICs indicated that they have privacy when showering, using the restroom and changing their clothes. Further conversation with IICs indicated inconsistency with the opposite gender announcement, some IICs stated it was made, some stated it was made sometimes and some stated it was never made.

Medical records are all paper and the records area is staffed 7am-10pm Monday through

Friday. The records door is to remain locked at all times and only medical and mental health care staff have access. Medical and mental health care staff are the only ones with access to the records. Medical records are only able to be viewed or provided to specific staff (i.e. investigator or Warden). Investigative files are paper and electronic. Only Internal Affairs staff have access to the investigations. Risk screening information is maintained in the electronic Offender 360 program and/or in the IIC's master file. Master files are maintained in records which is staffed Monday through Friday and the area is locked when not staffed. Access to the master file is to those with a need to know. During the tour the auditor had a security staff member pull up the electronic system to see what was able to be viewed. The staff was able to view the questions and the response of each IIC's risk assessment. During the interim report period the PREA Coordinator corrected this issue. The system was previously restricted and the agency retracted the restriction due to a technical issue. Once it was identified that access was again available to all staff, the PC took immediate action. The auditor was provided confirmation during the interim report period that the restrictions were once again implemented. The auditor was also able to test the restrictions during another IDOC audit that was conducted after East Moline's on-site portion of the audit.

During the tour the auditor observed that IICs are able to place outgoing mail in any of the locked boxes around the facility, including in the housing units. None of the boxes were specific to sexual abuse or sexual harassment allegations or information. The interview with the mailroom staff indicated that outgoing mail that is regular mail comes to them unsealed. The mail is read and inspected for contraband and is then sealed and sent out. Legal mail comes sealed and is not read or inspected. The mailroom staff stated that the incoming mail process starts with separating

and prioritizing (i.e. legal or regular). Regular mail is opened by staff who go through it, scan it and ensure it does not contain any contraband. IICs are then given the original documents. Legal mail is not opened by staff and is sent into the facility for a Sergeant to deliver to the IIC. The IIC opens the legal mail in the presence of staff. The mailroom staff stated that mail to and from JHA is treated like legal/privileged mail. The staff further stated mail to and from the local rape crisis center is also treated like legal/privileged mail.

The auditor observed the intake process through a demonstration. IICs are not provided any information upon intake. They receive information through the orientation process, which is completed within five days of arrival at the facility (usually the second day after arrival). IICs are provided the Orientation Manual (Handbook), the PREA Brochure, the PREA Talking Points/Facts page and the PREA Reporting Poster. Staff also show the PREA video and upon completion ask if anyone has any questions. The facility utilizes the PREA Resource Center's new PREA adult comprehensive education video. The video is shown in the vocational classroom on a 42 inch television. The auditor observed the video is available in English and in Spanish and has subtitles in the respective language. The staff do not verbally go over any information with IICs, they provide the documents and show the video.

The auditor was provided a demonstration of the initial risk assessment. The initial risk screening is completed in health services in a private office setting. The staff stated that while it was a private setting, a security staff member was in the office during this process. The risk screening is completed via the paper version of the form. Staff complete vitals and a medical assessment and then ask questions about height, weight, prior sexual victimization, prior sexual abusiveness, gender identity, sexual preference, if they

were ever incarcerated before, etc. The paper file is then placed in the mental health care staff box for them to review the information. Medical staff indicated they do not have access to some of the information to confirm responses, such as criminal history, but they do review the information available to them. The auditor also have staff demonstrate how they complete the risk reassessment. Clinical staff meet with the IIC within 30 days and complete the reassessment in a private office setting. The staff goes through the paper version of the questionnaire. Staff ask about disabilities, gender identity, sexual preference, prior sexual victimization, height, grade level and socioeconomic status. Staff enter information into O360 and shred the paper version of the form. Staff review information in O360 as well to verify responses.

The auditor called the internal PREA hotline on October 2, 2023 and left a message to test functionality. IICs are advised to select English or Spanish upon contact with the hotline. Initial phone instructions are provided in English and Spanish, however the hotline instructions/directions are only available in English. The auditor received confirmation from the PC on October 2, 2023 that the call was received and forwarded to him. IICs have access to the phones most of the day. The internal PREA hotline is accessible on all phones but does require an IIC number. IICs in segregated housing have access to the phones once a week. The auditor also tested the written reporting process. The auditor had an IIC assist with filling out a grievance on October 2, 2023. The auditor submitted the grievance via the grievance box in the housing unit. The auditor was provided confirmation on October 5, 2023 that the grievance was received and would be processed per policy if it was a report of sexual abuse or sexual harassment.

The auditor also tested the outside reporting



mechanism via a letter to the John Howard Association at a prior IDOC audit. The auditor obtained an envelope and sent a letter to the John Howard Association on January 10, 2023. The auditor obtained assistance from an IIC to utilize his name and number on the return address. The letter was placed in the outgoing US mail box by the IIC. While a return name and number is required, the mail staff do not open this mail and as such IICs are able to remain anonymous within the letter. The John Howard Association is utilized for numerous services and they are not just an organization to report sexual abuse. The auditor received confirmation on January 20, 2023 that the letter was received by the John Howard Association. A copy of the letter that was mailed was forwarded back to the auditor as well as the confirmation from John Howard Association staff that the IIC can remain anonymous.

Additionally during the tour, the auditor asked staff to demonstrate how they submit a written report. Staff indicated if they received a verbal report they would complete an incident report. The staff indicated they fill out the paper incident report and then provide it to the Sergeant or Lieutenant. Staff confirmed and demonstrated that forms are available in the housing units. Further, the staff confirmed that they can privately report directly to the Shift Commander or to Internal Affairs.

The auditor tested the third party reporting mechanism on January 22, 2023. The auditor called the PREA hotline as outlined on the agency website. The hotline is the same hotline utilized for the IIC population. The auditor received confirmation from the PREA Coordinator on January 23, 2023 that the message was received and forwarded to him to handle. He indicated he would provide the information to the facility for investigation if it was a report of sexual abuse or sexual harassment.

The auditor was unable to test access to victim advocacy services during the on-site portion of the audit. IICs can add the victim advocacy number to their call list and call through the IIC phones, which are monitored or recorded, or they can set up a legal call or visit with the organization through medical, mental health or their counselor. The IIC would request the confidential call and the staff member would set up the call. The advocate would call the facility and the call would be transferred to the legal call area. While this is a more confidential method for speaking to the victim advocate than in the housing unit with numerous other IICs surrounding them, the process is not known by staff or IIC. During the on-site portion of the audit the auditor attempted to contact the number provided via a staff phone and found the number was not functional. The auditor then called another number that the facility advised was associated with the organization and left a message, however the auditor did not receive a call back related to the voicemail. Additionally, the auditor emailed the organization and the email was returned undeliverable.

The auditor had the facility conduct a mock demonstration of the comprehensive PREA education process. Comprehensive PREA education is completed through the orientation process, which is completed within five days of arrival at the facility (usually the second day after arrival). IICs are provided the Orientation Manual (Handbook), the PREA Brochure, the PREA Talking Points/Facts page and the PREA Reporting Poster. Staff also show the PREA video and upon completion ask if anyone has any questions. The facility utilizes the PREA Resource Center's new PREA adult comprehensive education video. The video is shown in the vocational classroom on a 42 inch television. The auditor observed the video is available in English and in Spanish and has subtitles in the respective language.

The staff do not verbally go over any information with IICs, they provide the documents and show the video.

During IIC interviews the auditor utilized Propio for the LEP IIC interviews. The auditor was provided the call in number and utilized her cell phone to contact the number (the speaker on the phone being utilized was not functional). The services require a pin number and it is only accessible through staff. Propio provided phone interpretation for two Spanish speaking IICs.

Health Services included a reception area, exam rooms, treatment rooms, an ancillary area and a small infirmary. The ancillary area was a large room with solid doors. The exam and treatment rooms were rooms with small windows. Mobile barriers were observed in health services to provide additional privacy when needed. The infirmary was made up of three rooms with multiple beds. Adequate privacy was provided.

The segregated housing unit was a two tiered area with a hearing room and a separate outdoor recreation area. The hearing room was also utilized for any indoor recreation. PREA Reporting Posters were observed in English and Spanish on the bulletin boards. IICs are provided out of cell time through recreation, showers and visitation. Showers are three days a week and recreation is offered two times a day. Phone access is provided once a week. Mail and grievances can be placed in a locked box when out of the cell or can be provided to staff.

### **Documentation Sampling**

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

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

Yes

No

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

During the audit the auditor requested personnel and training files of staff, IIC files, medical and mental health records, grievances, incident reports and investigative files for review. A more detailed description of the documentation review is as follows:

Personnel and Training Files. The auditor reviewed a random sample of 36 personnel and/or training files that included four individuals hired within the past twelve months and two staff promoted during the previous twelve months. The personnel and/or training files also included eight contractor, four volunteers and seven medical and mental health care staff.

Individual in Custody Files. A total of 31 IIC files were reviewed. 25 were of those that arrived within the previous twelve months, four were LEP IICs, six were disabled IICs, and five were identified with prior sexual victimization and/or a history of prior abusiveness.

Medical and Mental Health Records. The auditor reviewed medical and mental health documentation for seven IICs who reported sexual abuse or sexual harassment as well as mental health documents for five IICs who disclosed victimization during the risk screening and/or were identified with prior sexual abusiveness.

Grievances. The auditor reviewed the grievance logs as well as the sexual abuse grievances.

Incident Reports. The auditor reviewed the incident reports for all sexual abuse and sexual harassment allegations as well as a sample of incident reports.

Investigation Files. There were seven allegations reported during the previous twelve months. Two of the allegations did not meet the definition of sexual abuse or sexual

harassment. The auditor reviewed all seven investigations. There were zero criminal investigations and zero investigations referred for prosecution.

## **SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

### **Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

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

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

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	1	0	1	0
<b>Staff-on-inmate sexual abuse</b>	2	0	2	0
<b>Total</b>	3	0	3	0

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

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	2	0	2	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	2	0	2	0

**Sexual Abuse and Sexual Harassment Investigation Outcomes**

**Sexual Abuse Investigation Outcomes**

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	1	0
<b>Staff-on-inmate sexual abuse</b>	0	0	2	0
<b>Total</b>	0	0	3	0

**Sexual Harassment Investigation Outcomes**

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



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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	1	1
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	0	1	1

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

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

4

<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

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

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	0
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	The auditor reviewed all allegations in the previous twelve months, including two allegations that did not rise to the level of PREA.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

## Non-certified Support Staff

**116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

Yes

No

## AUDITING ARRANGEMENTS AND COMPENSATION

**121. Who paid you to conduct this audit?**

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive (AD) 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. East Moline Correctional Center Institutional Directive (ID) 04.01.301 Sexual Abuse and Harassment Prevention and Intervention</li> <li>4. Administrative Directive 01.02.103 Duty Administrative Officer, Back-up Duty Administrative Officer and Required Inspection Tours</li> <li>5. Administrative Directive 04.03.104 Evaluation, Treatment and Correctional Management of Transgender Offenders</li> <li>6. Administrative Directive 05.01.113 Searches of Offenders</li> </ol>

7. Administrative Directive 04.01.105 Facility Orientation
8. Administrative Directive 04.01.111 ADA Accommodations
9. Administrative Directive 05.07.101 Reception and Classification Process
10. Administrative Directive 01.12.120 Investigations of Unusual Incidents
11. Administrative Directive 01.12.112 Preservation of Physical Evidence
12. Administrative Directive 01.12.101 Employee Criminal Misconduct
13. Administrative Directive 01.12.125 Uniform Investigative Reporting System
14. Administrative Directive 01.12.115 Institutional Investigative Assignment
15. Administrative Directives 01.01.101 Administrative Directives
16. Administrative Directive 01.02.101 Staff Meeting
17. Administrative Directive 04.01.122 Volunteer Services
18. Administrative Directive 03.03.102 Employee Training
19. Administrative Directive 05.15.100 Restrictive Housing
20. Administrative Directive 04.01.114 Local Offender Grievance Procedures
21. Administrative Directive 03.01.120 Employee Review Hearing
22. Standard Operating Procedural (SOP) Manual for Mental Health
23. Illinois Administrative Code 20.504
24. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)
25. Agency Organizational Chart
26. Facility Organizational Chart

Interviews:

1. Interview with the PREA Coordinator
2. Interview with the PREA Compliance Manager

Findings (By Provision):

115.11 (a): The PAQ indicated that the agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The PAQ also stated that the facility has a policy outlining how it will implement the agency's approach to preventing, detecting and responding to sexual abuse and sexual harassment and that the policy includes definitions on prohibited behaviors regarding sexual abuse and sexual harassment and sanctions for those found to have participated in prohibited behaviors. The PAQ further stated that the policy includes a description of agency strategies and response to reduce and prevent sexual abuse and sexual harassment of IICs. The agency policy, AD 04.01.301 outlines the agency's strategies on preventing, detecting and responding to sexual abuse and include definitions of prohibited behavior. Page 1 states that the agency has a zero tolerance policy. In addition ID 04.01.301, outlines the facility specific procedures on preventing, detecting and responding to sexual abuse and sexual harassment. Page 2 (both policies) provide the definitions of prohibited behaviors and page 12 outlines sanctions for those who have participated in prohibited behaviors. In addition to AD and ID 04.01.301, the agency has numerous other policies that address portions of sexual abuse prevention, detection and response strategies. The policies include: 01.02.103, 04.03.104, 05.01.113, 04.01.105, 04.01.111, 05.07.101, 01.12.120, 01.12.112, 01.12.101, 01.12.115, 01.01.101, 01.02.101, 04.01.122, 03.03.102, 05.15.100, 04.01.114, 03.01.120, SOP Manual for Mental Health and Illinois Administrative Code 20.504. The policies address "preventing" sexual abuse and sexual harassment through the designation of a PC and PCM, training (staff, volunteers and contractors), staffing, intake/risk screening, IIC education and posting of signage (PREA posters, etc.). The policies address "detecting" sexual abuse and sexual harassment through training (staff, volunteers, and contractors) and intake/risk screening. The policies address "responding" to allegations of sexual abuse and sexual harassment through reporting, victim services, medical and mental health services, employee and IIC discipline, incident reviews and data collection. The policies are consistent with the PREA standards and outline the agency's approach to sexual safety. Additionally, the agency has the PREA Manual which addresses each provision of each standard and has corresponding direction, if applicable, related to the provision/standard. The PREA Manual is utilized by agency staff as a road map for PREA compliance.

115.11 (b): The PAQ indicated that the agency employs or designates an upper-level, agency-wide PREA Coordinator with sufficient time and authority to develop, implement and oversee agency efforts to comply with the PREA standards. AD 04.01.301, page 3 states that the Director shall designate an Agency PREA Coordinator who shall develop, implement and oversee the Department's Sexual Abuse and Harassment Prevention and Intervention Program. The agency's organizational chart reflects that the PC position is an upper-level, agency-wide position. The position is the Senior Public Service Administrator who reports to the Chief Compliance Officer who reports to the Director. The interview with the PC indicated that the work gets done, but often requires that he work long hours. He stated the Department is currently in the process of restructuring the PREA Unit to



incorporate additional staff. Eventually, the IDOC PREA Compliance Unit will consist of one Senior Public Service Administrator (Agency PREA Coordinator), two Administrative Assistant II positions, and three Internal Security Investigator II positions. The PC stated there are a total of 31 PREA Compliance Managers and 31 Backup PREA Compliance Managers. Collaboration with the individuals occurs using in-person and WebEx meetings, SharePoint and an email distribution list in Outlook. Additionally, he stated that site visits are made to all facilities, and he is always available via email/phone. The interview with the PC indicated that if he identifies an issue complying with a PREA standard he would contact the specific Department Head and notify them of a concern and develop corrective action collectively. He indicated If the issue requires a policy change, the Department's Policy and Directive Unit as well as the Legal Department are utilized. Additionally, he stated that he can also utilize the National PREA Resource Center and networking with other states if necessary. It should be noted that the agency PC is very knowledgeable of policy, procedure and the PREA standards. He is directly involved in compliance across all facilities and provides annual training to agency staff, including PREA Compliance Managers. He also conducts trainings for investigators. The PC is very involved in all compliance and consistently works at adapting policy and procedure with the updates provided by the PREA Resource Center. The time, authority and knowledge of the PC exceeds the requirement of this standard.

115.11 (c): The PAQ indicated that the facility has designated a PREA Compliance Manager that has sufficient time and authority to coordinate the facility's efforts to comply with PREA standards. The PAQ stated the position of PCM at the facility is the Clinical Services Supervisor and the position reports to the Assistant Warden of Programs. AD 04.01.301, page 4 states that the Chief Administrative Officer of each correctional facility shall designate a facility PREA Compliance Manager with sufficient time and authority to coordinate the facility's efforts to comply with PREA standards and who is trained in sexual abuse crisis issues and has the knowledge, skills and abilities for program implementation and evaluation. The facility's organizational chart indicates that the PCM reports to the Assistant Warden of Programs. The interview with the PREA Compliance Manager indicated has enough time to manage all of her PREA related responsibilities She stated because there has only been seven allegations there hasn't been a lot to coordinate. She indicated she works with Internal Affairs about any concerns and she attends the weekly restrictive housing unit meetings where many key players attend so she can discuss any issues or concerns at that time. The PCM stated if she identified an issue complying with a PREA standard she would research the standard and then develop a step by step method to correct the issue.

Based on a review of the PAQ, AD 04.01.301, ID 04.01.301, 01.02.103, 04.03.104, 05.01.113, 04.01.105, 04.01.111, 05.07.101, 01.12.120, 01.12.112, 01.12.101, 01.12.115, 01.01.101, 01.02.101, 04.01.122, 03.03.102, 05.15.100, 04.01.114, 03.01.120, SOP Manual for Mental Health, Illinois Administrative Code 20.504, the PREA Manual, the agency organizational chart, the facility organizational chart and

	information from interviews with the PC and PCM, this standard appears to be compliant.
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Contracts for Confinement of Individuals In Custody</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency’s Contract Administrator</li> </ol> <p>Findings (By Provision):</p> <p>115.12 (a): The PAQ indicated that the agency has entered into or renewed two contracts for the confinement of IICs since the last PREA audit and both contracts require the contractor to adopt and comply with PREA standards. A review of the two contracts confirmed that language is included in each contract that states that the “vendor shall comply with all applicable fiscal, operational and program policies of the IDOC contained in Administrative Directives, Administrative Rules and applicable memoranda. IDOC shall provide at least one complete set to the Center”. It also states that the “vendor shall grant open access, at all times, to the IDOC for inspection, audits, routine IDOC business and any other purposes relating to this program as determined by the IDOC”.</p> <p>115.12 (b): The PAQ indicated that the two contracts require the agency to monitor the contractor’s compliance with PREA standards. The interview with the Agency Contract Administrator indicated that individual correctional facilities do not contract for confinement services on their own. The IDOC does contract with Safer Foundations for the confinement of offenders in a Community Confinement setting. The two facilities are stand-alone facilities and both facilities undergo their own PREA audit every three years just like the facilities operated by the State. The Agency Contract Administrator confirmed that both contracts require full compliance with the PREA standards and both PREA audit reports are available on the IDOC website. A review of</p>

	<p>the agency website confirmed that both contracted facilities had a PREA audit completed during each of the previous three audit cycles. All reports are available for review on the website.</p> <p>Based on the review of the PAQ, the language within the contracts and information from the interview with the Agency Contract Administrator, this standard appears to be compliant.</p>
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<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 01.02.103 Duty Administrative Officer, Back-up Duty Administrative Officer and Required Inspection Tours</li> <li>4. Staffing Plan</li> <li>5. Camera Listing</li> <li>6. Staffing Plan Review</li> <li>7. Deviations from the Staffing Plan (Daily Rosters)</li> <li>8. Documentation of Unannounced Rounds</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Warden</li> <li>2. Interview with the PREA Compliance Manager</li> <li>3. Interview with the PREA Coordinator</li> <li>4. Interviews with Intermediate-Level or Higher-Level Facility Staff</li> </ol> <p>Site Review Observations:</p>

1. Staffing Levels
2. Video Monitoring Technology or Other Monitoring Materials

Findings (By Provision):

115.13 (a): The PAQ indicated that the agency requires each facility it operates to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect IICs against abuse. AD 04.01.301 pages 4-5 address the agency's staffing plan development. Specifically, it states that the Chief Administrative Officer of each correctional facility shall ensure the facility develops, documents and makes its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and where applicable, video monitoring, to protect IICs against sexual abuse and sexual harassment. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: generally accepted correctional practices, any judicial findings of inadequacy, any finding of inadequacy from Federal investigative agencies, any finding of inadequacy from internal or external oversight bodies, all components of the facility's physical plant including blind-spots or areas where staff or offenders may be isolated, the composition of the offender population, the number and placement of supervisory staff, institutional programs occurring on a particular shift, any applicable State or local laws, the prevalence of substantiated and unsubstantiated incidents of abuse and any other relevant factors. The PAQ indicated that the staffing plan is based on 1574 IICs. The facility employs 284 staff. Security staff mainly make up three shifts; 7am-3pm, 3pm-11pm and 11pm-7am. Each shift has a Shift Commander as well as area supervisors (Lieutenants and Sergeants) and Correctional Officers. Supervisors and Officers are assigned to housing units as well as other areas including; movement, chapel, laundry, education, vocation, gym, yard, visitation, medical, fence and ate. Additionally, medical and mental health care staff and administrative staff have their own varied scheduled work hours. During the tour the auditor confirmed the facility follows the staffing plan. There was at least one security staff per housing unit. Additionally, there were zone supervisors (Lieutenants and Sergeants) across different zones of the facility. Program, work and education areas included non-security staff and either a positioned or roving security staff member. In areas where security staff were not directly assigned, routine security checks were required. The auditor confirmed that the physical plant of the housing units provided an adequate line of sight in conjunction with routine security checks/ rounds. The facility did not appear to be overcrowded and staffing appeared to be adequate based on the population. The auditor identified numerous blind spots due to the age of the facility including in the laundry areas in the housing units, in facility laundry, in the warehouse and in vocation (regular and construction). The facility had very limited video monitoring technology but they did have a few mirrors in spaces to alleviate blind spots. The facility staff indicated they have had the video monitoring

technology available since 2020 but they have not had someone to install the equipment. Informal conversation with staff and IICs indicated staff conduct rounds every 30 minutes, at minimum, and they see a supervisor (Lieutenant) at least once a day. The interview with the Warden confirmed that the facility has a staffing plan that includes adequate levels to protect IICs from sexual abuse. He stated they have closed some of their housing units so staffing is more than adequate with the number of IICs they currently house. The Warden stated video monitoring would be part of the staffing plan if it was installed. The Warden stated the elements under this provision are included in the staffing plan development and review. He indicated that day shift has more staff as this is when most activities take place. He indicated there is ample staff for movement and to run education and programs. He indicated the staffing plan takes into consideration what is going on and where individuals will be so that staff coverage is adequate. The Warden stated that they check for compliance with the staffing plan through a review of the daily roster. The PCM indicated she is not part of the process for staffing. She further stated they have video monitoring technology (since 2020) but that it has not been installed.

115.13 (b): The PAQ indicated that each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. The PAQ further indicated that there have been no deviation or common reasons for deviations. AD 04.01.301, page 5 states that if circumstances arise where the staffing plan is not complied with, the facility shall document and justify all deviation from the plan on the Daily Roster review, DOC 0531, in accordance with 05.01.101. The interview with the Warden confirmed that any deviations from the staffing plan would be documented on the daily roster. A review of daily rosters confirmed that deviations are documented through the number of staff in each category (i.e. call ins, training, military, etc.) as well the posts that are closed due to the deviations.

115.13 (c): The PAQ indicated that at least once a year the facility in collaboration with the PC, reviews the staffing plan to see where adjustments are needed. AD 04.01.301, page 5 states that whenever necessary, but no less frequent than once per year, the facility, in consultation with the Agency PREA Coordinator, shall assess, determine and document whether adjustments are needed to the staffing plan established herein, the facility's deployment of video monitoring systems and other monitoring technologies, and the resources the facility has available to ensure adherence to staffing plan. The staffing plan was most recently reviewed on September 27, 2022. The plan was reviewed to assess, determine and document whether any adjustments were needed to the staffing plan, the deployment of video monitoring technologies and/or the resources available to commit to ensuring adherence to the staffing plan. The staffing plan review included documentation on the facility staffing allocations, cameras and all the required components under provision (a) of this standard, including physical plant, finding of inadequacy, composition of IIC population, programs occurring on each shift, incidents of sexual abuse and other relevant factors. The staffing plan was previously reviewed on July 2,

2021. The PC confirmed that he is consulted regarding each facility's staffing plan. He stated staffing assessments are reviewed consistently by Operations (Roster Review Team, Security Review Team, etc.) and updates to the Staffing Plan are signed off on by the facility Warden and PREA Coordinator on an annual basis.

115.13 (d): The PAQ indicated that the facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The PAQ further states that the facility documents the unannounced rounds and the rounds cover all shifts. Additionally, the PAQ stated that the facility prohibits staff from alerting other staff of the conduct of such rounds. 01.02.103, page 3 states that the Back-up Duty Administrative Officer (BUDAO) or Duty Administrative Officer (DAO) shall at least every two days, excluding weekends and holidays, inspect activity areas of the facility, housing units, including restrictive housing, kitchens and dining rooms, health care units, recreation areas and educational, vocational, maintenance and industry buildings. Page 4 states that the BUDAO shall conduct unscheduled inspections of random areas within the facility for all major holidays, during back shift, each weekend and at satellite facilities. The policy states that the unscheduled inspection of random areas within the facility on the DOC 0481. The policy further states that staff shall be prohibited from alerting other staff member that supervisory rounds are occurring unless such announcement is related to the legitimate operational function of the facility. The auditor requested documentation from six specific days over the previous twelve months to determine if unannounced rounds were being made. A review of the documentation indicated most housing units had unannounced rounds documented on the 7am-3pm shift, however rounds for the 3pm-11pm shift and 11pm-7am shift were not routinely completed. The interviews with the intermediate-level or higher-level staff confirm that they make unannounced rounds and that they document the unannounced rounds. The staff stated that unannounced rounds are documented in the log books in the housing units and in the DAO book. The supervisors indicated they ensure staff don't notify one another of the rounds by not establishing a pattern. The staff stated they do rounds at random times and go to different locations. Informal conversation with staff and IICs indicated staff conduct rounds every 30 minutes, at minimum, and they see a supervisor (Lieutenant) at least once a day.

Based on a review of the PAQ, 04.01.301, 01.02.103, the facility staffing plan, the staffing plan review, camera listings, documentation of unannounced rounds, deviations from the staffing plan, observations made during the tour and interviews with the PC, PCM, Warden and intermediate-level or higher-level staff, this standard appears to require corrective action. The auditor identified numerous blind spots due to the age of the facility including laundry areas in the housing units, in facility laundry, in the warehouse and vocation (regular and construction). The facility had very limited video monitoring technology but they did have a few mirrors in spaces to alleviate blind spots. The facility staff indicated they have had the video monitoring technology available sine 2020 but they have not had someone to install the

equipment. A review of the documentation indicated most housing units had unannounced rounds documented on the 7am-3pm shift, however rounds for the 3pm-11pm shift and 11pm-7am shift were not routinely completed.

#### Corrective Action

The facility will need to alleviate the identified blind spots by either installing numerous mirrors in the spaces or by installing the video monitoring technology that is available. Photos of the mirrors and/or documentation of camera coverage will need to be provided. The facility will need to provide the originally requested documentation related to unannounced rounds, or if not available the facility will need to train staff on the requirement of rounds. The facility will need to provide unannounced rounds for all housing units for all three shifts during the corrective action period (auditor can select dates).

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Photos of Installed Mirrors
2. Unannounced Rounds

The facility provided eighteen photos of mirrors installed across the areas identified with blind spots. Mirrors were installed to alleviate blind spots.

The facility provided the originally requested unannounced rounds documentation that confirmed that unannounced rounds are completed across all shifts in each housing unit. The documentation provided indicated unannounced round are completed at least weekly.

Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Public Act 99-628</li> <li>3. Memorandum from Legal Counsel</li> </ol> <p>Findings (By Provision):</p> <p>115.14 (a): The PAQ and the memo from Legal Counsel indicated that no youthful IICs are housed at East Moline Correctional Center and as such this standard is not applicable. Public Act 99-628 (effective January 1, 2017) states that all offenders under eighteen years of age when sentenced to imprisonment shall be committed to the Department of Juvenile Justice and the court in its order of commitment shall set a definite term. As of January 1, 2017, newly sentenced seventeen year old offenders are to be admitted into the penitentiary system at an Illinois Department of Juvenile Justice facility and later subject to permanent transfer to IDOC pursuant to 730 ILCS 5/3-10-7€ after attaining the age of eighteen.</p> <p>115.14 (b): The PAQ and the memo from Legal Counsel indicated that no youthful IICs are housed at East Moline Correctional Center and as such this standard is not applicable. Public Act 99-628 (effective January 1, 2017) states that all offenders under eighteen years of age when sentenced to imprisonment shall be committed to the Department of Juvenile Justice and the court in its order of commitment shall set a definite term. As of January 1, 2017, newly sentenced seventeen year old offenders are to be admitted into the penitentiary system at an Illinois Department of Juvenile Justice facility and later subject to permanent transfer to IDOC pursuant to 730 ILCS 5/3-10-7€ after attaining the age of eighteen.</p> <p>115.14 (c): The PAQ and the memo from Legal Counsel indicated that no youthful IICs are housed at East Moline Correctional Center and as such this standard is not applicable. Public Act 99-628 (effective January 1, 2017) states that all offenders under eighteen years of age when sentenced to imprisonment shall be committed to the Department of Juvenile Justice and the court in its order of commitment shall set a definite term. As of January 1, 2017, newly sentenced seventeen year old offenders are to be admitted into the penitentiary system at an Illinois Department of Juvenile</p>



	<p>Justice facility and later subject to permanent transfer to IDOC pursuant to 730 ILCS 5/3-10-7€ after attaining the age of eighteen.</p> <p>Based on a review of the PAQ, the memo from Legal Counsel and Public Act 99-628, this standard appears to be not applicable and as such, compliant.</p>
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<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 04.03.104 Evaluation, Treatment and Correctional Management of Transgender Offenders</li> <li>4. Administrative Directive 05.01.113 Searches of Offenders</li> <li>5. Post Description Correctional Officer Housing Unit Wing 1</li> <li>6. Rehabilitation, Safety Management and Care for Transgender People in Correctional Settings Curriculum</li> <li>7. Personal Searches Curriculum</li> <li>8. Personal Search Card</li> <li>9. Staff Training Records</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interviews with Random Staff</li> <li>2. Interviews with Random Individuals In Custody</li> <li>3. Interviews with Transgender and/or Intersex Individuals In Custody</li> </ol> <p>Site Review Observations:</p>

1. Observations of Privacy Barriers
2. Observation of Cross Gender Announcement

Findings (By Provision):

115.15 (a): The PAQ indicated that the facility does not conduct cross gender strip or cross gender visual body cavity searches of IICs. The PAQ stated zero searches of this kind were conducted at the facility over the past twelve months. 05.01.113, page 2 states that cross-gender strip searches shall be prohibited. A review of the Personal Searches Curriculum confirmed that page 4 discusses the prohibition under 05.01.113.

115.15 (b): The PAQ indicated that the facility does not permit cross-gender pat-down searches of female IICs, absent exigent circumstances and the facility does not restrict female IICs' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. The PAQ stated there have been zero pat-down searches of female IIC by male staff. The Personal Searches Curriculum, page 4 indicates that staff are trained that only female correctional employees, who are properly trained, are authorized to conduct pat down or clothed body searches of female offenders. There were zero female or transgender female IICs at the facility.

115.15 (c): The PAQ indicated that facility policy requires that all cross-gender strip searches and cross gender visual body cavity searches be documented and that all cross-gender pat-down searches of female IICs be documented. 01.12.105, page 3 states that notification of serious and significant unusual incidents shall be in accordance with the provisions of this directive. Page 3 states that following initial notification of the respective Deputy Director or Chief, the Chief Administrative Officer shall ensure electronic notification of the incident is provided and the notification includes the date and time, offenders involved, staff involved and narrative of the incident. The Personal Search Manual, page 4 states that in exigent or emergency circumstances, a male correctional employee, who is properly trained, may conduct a search if a properly trained, female correctional employee is not available. An exigent or emergency situation is one in which a reasonable suspicion exists that a weapon, or another item of serious contraband, is present and it presents an immediate danger to the offender(s), facility security, or the public which cannot be safely averted either by securing, escorting or isolating the offender.

115.15 (d): The PAQ stated that the facility has implemented policies and procedures

that enable IICs 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. Additionally, the PAQ stated that policies and procedures require staff of the opposite gender to announce their presence when entering an IIC housing unit. 04.01.301, page 7 indicates that offenders shall 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 when such viewing is incidental to routine cell checks. Page 7 further notates that staff of the opposite gender, whether assigned to the unit or not, shall make the following verbal announcement upon their arrival in a housing unit "Male/Female in the housing unit". Additionally, Post Description Correctional Officer Housing Unit Wing 1, page 2 states that the assigned correctional officer is responsible for announcing any male staff member upon their entrance to the housing unit in accordance with PREA Standard 115.15 (Limits to Cross Gender Viewing) "Knock and Announce" policy. In addition, a general announcement that male staff will be present should occur at the beginning of each shift and at least once more during the shift. During the tour the auditor observed that IICs have privacy when showering and using the restroom via curtains and doors. Search areas also provided privacy through doors and barriers. With regard to the opposite gender announcement, the auditor heard the announcement made verbally upon entry into a few of the housing units. The auditor observed that the announcement was inconsistent and was not a routine process. The agency also has a paging system for the deaf and hard of hearing IICs where the announcement can be sent out to their watches. Informal conversation with IICs indicated that they have privacy when showering, using the restroom and changing their clothes. Further conversation with IICs indicated inconsistency with the opposite gender announcement, some IICs stated it was made, some stated it was made sometimes and some stated it was never made. All thirteen random staff interviewed stated that IICs have privacy when showering, using the restroom and changing clothes through curtains. All 26 IICs interviewed indicated they had never been naked in front of a staff member of the opposite gender and have privacy when using the restroom, showering and changing their clothes. Nine of the 26 IICs stated that staff of the opposite gender announce when they enter IIC housing units. All thirteen staff stated that opposite gender staff announce their presence when entering an IIC housing unit.

115.15 (e): The PAQ indicated that the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex IIC for the sole purpose of determining the IIC's genital status and no searches of this nature occurred in the past twelve months. 05.01.113, page 2 states that staff shall not search or physically examine a transgender or intersex offender for the sole purpose of determining the offender's genital status. If the offender's genital status is unknown, it may be determined during conversation with the offender, reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. Interviews with thirteen random staff

indicated that ten were aware of an agency policy that prohibits strip searching a transgender or intersex IIC for the sole purpose of determining the IICs' genital status. There were zero transgender or intersex IICs at the facility during the on-site and as such no interviews were completed.

115.15 (f): 05.01.113, page 2 states that the Office of Staff Development and Training shall ensure security staff are trained in conducting searches of offenders in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Page 11 further states that offenders designated as transgender non-conforming shall be designated as such in Offender 360 and provided an offender identification card specifying the gender of staff that will perform strip searches of that offender as determined by the Transgender Administrative Committee in consultation with the offender. If a strip search is to be performed, the transgender or gender non-conforming offender shall be searched by the gender of the staff designated on their offender identification card. 04.03.104, pages 8-9 also outline the same information described in 05.01.113. The Personal Search Curriculum pages 3-4 outline the basic guidelines for conducting searches including being systematic, thorough, objective and consistent. Page 5 states that when conducting searches of a transgender or intersex offender, the searches should be conducted in a professional and respectful manner, consistent with the type of search being conducted, and security needs. Searches should be complete in accordance with applicable Administrative Directives or Institutional Directives based on the gender of the facility, unless otherwise directed by the CAO. The training further states that if an offender has been confirmed and identified in Offender 360 or on their identification badge to be transgender or gender non-conforming, the offender may express preferences to be searched by a male or female staff of their gender identify rather than the gender staff above, that request will be considered and if possible, honored, if staff are available to do so. Staff are also provided training titled Rehabilitation, Safety Management and Care for Transgender People in Correctional Settings. A review of the training confirmed that staff are provided information on definitions and terminology, appropriate language, bias, gender informed professional skills including appropriate language and misgendering, statistics and policy and procedure related to transgender care. Staff are also provided a personal search card that outlines the steps for offender pat-searches and offender strip searches. The PAQ indicated that 100% of staff have received this training. Interviews with random staff indicated that twelve of the thirteen had received training on how to conduct cross-gender pat down searches and searches of a transgender and intersex IICs. The auditor requested training documentation for fifteen security staff. At the issuance of the interim report only one training record was provided.

Based on a review of the PAQ, 04.01.301, 04.03.104, 05.01.113, Post Description Correctional Officer Housing Unit Wing 1, Rehabilitation, Safety Management and Care for Transgender People in Correctional Settings Curriculum, Personal Searches

Curriculum, Personal Search Card, staff training records, observations made during the tour, as information from interviews with random staff and random IICs indicates this standard appears to require further corrective action. With regard to the opposite gender announcement, the auditor heard the announcement made verbally upon entry into a few of the housing units. The auditor observed that the announcement was inconsistent and was not a routine process. Further, information conversation indicated inconsistency with the opposite gender announcement, some IICs stated it was made, some stated it was made sometimes and some stated it was never made. Nine of the 26 IICs stated that staff of the opposite gender announce when they enter IIC housing units. The auditor requested training documentation for fifteen security staff. At the issuance of the interim report only one training record was provided.

#### Corrective Action

The facility will need to train staff on the process for the opposite gender announcement to ensure that is made anytime the status quo changes in a housing unit. The facility will need to provide the training confirmation. Additionally, the originally requested training documentation will need to be provided.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Training Memorandum Related to Opposite Gender Announcement
2. Staff Training

The facility provided a training memorandum that outlined the appropriate procedure for the opposite gender announcement. The training memo as read at roll call for five days from April 1-6, 2024. Shift Supervisor initiated the document confirming the completion.

Further, documentation was provided confirming all fifteen security staff had

	<p>completed the training on cross gender searches and searches of transgender and intersex IICs.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 04.01.105 Facility Orientation</li> <li>4. Administrative Directive 04.01.111 ADA Accommodations</li> <li>5. Administrative Directive 05.07.101 Reception and Classification Process</li> <li>6. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>7. Video Remote Interpreting Information</li> <li>8. Language Interpretation Procedure – Propio Language Services, LLC.</li> <li>9. Individuals In Custody Orientation Manual (Handbook)</li> <li>10. PREA Posters</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency Head</li> <li>2. Interviews with LEP and Disabled Individuals In Custody</li> <li>3. Interviews with Random Staff</li> </ol>

Site Review Observations:

1. Observations of PREA Posters

Findings (By Provision):

115.16 (a): The PAQ stated that the agency has established procedures to provide disabled IICs 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. 04.01.301, pages 7-8 state that the Department shall provide offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to offender who have limited reading skills. 04.01.111, pages 3-4 indicate that the CAO shall ensure offenders are provide with information regarding ADA disability accommodations and shall establish procedures for offender access to teletypewriter (TTY) and Video Remote Interpreting (VRS) equipment. The policy also indicates that the CAO shall find alternative notification methods for auditory announcements (tactile paging system). 05.07.101, page 2 states that all videos used during orientation shall include closed captioning subtitles and closed captioning utilizing American Sign Language which has been reviewed for accuracy of the interpretation by the Illinois Deaf and Hard of Hearing Commissioner or a qualified interpreter. The policy further states that the department shall reserve the first row of seats during orientation for offenders who are disabled. A review of PREA Posters, Handbook and distributed information confirmed that information can be provided in large font and bright colors and can be read to IICs in terminology that they understand. Additionally, pages 41-42 of the Handbook provide information on Americans with Disabilities (ADA) including requesting accommodations, telecommunication equipment and sign language information. During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or grievance, by writing to the PREA Coordinator or by sending privileged mail to the John Howard Association. The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. In addition to the Posters, housing units had the PREA Hotline number painted in the housing units. The interview with the Agency Head confirmed that the agency has an Administrative Directive, 04.01.111 ADA

Accommodations and Propio Language Service Contact that establishes procedures to provide IICs with disabilities and IICs who are limited English Proficient 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. The Agency Head stated that orientation/educational materials are available in Spanish and that orientation is also available via video with the use of American Sign Language and Spanish translation. The interview further indicated that offenders have the ability to participate in interactive dialogue with staff if further clarification is warranted. Interviews with four disabled IICs and two LEP IICs indicated four were provided information in a format that they could understand. One LEP IIC stated that he was not provided education but that the posters were in a format he could understand.

115.16 (b): The PAQ indicates that the agency has established procedures to provide IICs with limited English proficiency 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. 04.01.301, pages 7-8 state that the Department shall provide offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to offender who have limited reading skills. 04.01.105, page 2 states that for a non-English speaking offender, reasonable efforts shall be made for the orientation to be explained to him or her in a language her or she understands. It further states that offenders shall receive written orientation material and/or translation in their own language and when a literacy problem exists, a staff member shall assist the offender in understanding the materials. The facility also has a contract with Propio Language Services, LLC. This company provides the facility a phone number that they can call that connects the staff member with a translator who can will translate information between the staff member and LEP IIC. The company has interpretation services for over 600 languages. A review of PREA Posters, Handbook and distributed information confirmed that information is available in both English and Spanish and can be translated into other languages, as needed. During the tour The auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or grievance, by writing to the PREA Coordinator or by sending privileged mail to the John Howard Association. The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. In addition to the Posters, housing units had the PREA Hotline number painted in the housing units. During IIC interviews the



auditor utilized Propio for the LEP IIC interviews. The auditor was provided the call in number and utilized her cell phone to contact the number (the speaker on the phone being utilized was not functional). The services require a pin number and it is only accessible through staff. Propio provided phone interpretation for two Spanish speaking IICs. Interviews with four disabled IICs and two LEP IICs indicated four were provided information in a format that they could understand. One LEP IIC stated that he was not provided education but that the posters were in a format he could understand.

115.16 (c): The PAQ indicated that agency policy prohibits use of IIC interpreters, IIC readers, or other type of IIC assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the IIC's safety, the performance of first responder duties, or the investigation of the IIC's allegation. The PAQ further stated the agency/facility documents the limited circumstances and that there were zero instances where an IIC was utilized to interpret, read or provide other types of assistance. 04.01.301, page 9 states staff shall not rely on individuals in custody to act as interpreters when reporting or investigating allegations of sexual abuse or sexual harassment for other individuals in custody who do not speak English, or who may speak very limited English; except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the safety of the individual. Use of such interpreters shall be documented. Interviews with thirteen random staff indicated eleven were aware of a policy that prohibits utilizing IIC interpreters, readers or other types of IIC assistants for sexual abuse allegations. None of the thirteen were aware of a time that another IIC was utilized for sexual abuse allegations. Interviews with four disabled IICs and two LEP IICs indicated four were provided information in a format that they could understand. None of the IICs indicated that a translator, interpreter, reader or other assistant was utilized.

Based on a review of the PAQ, 04.01.301, 04.01.105, 04.01.111, 05.07.101, the PREA Manual, VRS/TTY information, Propio Language Services LLC information, photos of the video interpretation phones, PREA Posters, the Handbook, observations made during the tour to include the PREA Posters as well as interviews with the Agency Head, random staff, IICs with disabilities and LEP IICs indicates that this standard appears to be complaint.

#### Recommendation

The auditor highly recommends that the facility provide refresher training with appropriate staff on the services available for accommodations for LEP and disabled IICs, including language services, ASL video services, etc.

**115.17 Hiring and promotion decisions**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 01.02.107 Background Investigations
3. Administrative Directive 03.02.100 Administrative Review of Personnel or Service Issues
4. Administrative Directive 03.02.108 Standards of Conduct
5. PREA Preemployment Self Report DOC 0450
6. PREA Questionnaire for Institutional Employers DOC 0589
7. Arrest Tracking Process Memorandum
8. Personnel Files of Staff
9. Contractor Background Files

Interviews:

1. Interview with Human Resource Staff

Findings (By Provision):

115.17 (a): The PAQ indicated that agency policy prohibits hiring or promoting anyone who may come in contact with IICs, and shall not enlist the services of any contractor who may have contact with IICs if they have: engaged in sexual abuse in prison, jail, lockup or any other institution; been convicted of engaging or attempting to engage in sexual activity in the community or has been civilly or administratively adjudicated to have engaged in sexual abuse by force, overt or implied threats of force or coercion. 03.02.100, page 3 states that the Department shall not hire, promote or enlist the services of any employee, contractual or otherwise, who may have contact with offenders and: has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution a defined in 42 U.S.C. 1997; has been convicted of engaging in or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats or force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or

administratively adjudicated to have engaged in the activity described above. A review of personnel files for four staff who were hired in the previous twelve months confirmed that all four had a criminal background records check completed. All four also completed the DOC 0450 Prison Rape Elimination Act Pre-Employment Self-Report, which contains the PREA questions outlined under this standard. There were zero contractors hired over the previous twelve months and as such there were zero contractor personnel records reviewed.

115.17 (b): The PAQ indicated that the agency considers any incidents of sexual harassment in determining whether to hire or promote any staff or enlist the services of any contractor who may have contact with an IIC. 03.02.100, page 3 states that the Department shall consider any incident of sexual harassment in determining whether to hire or promote anyone, or enlist the services of any contractual employee, who may have contact with offenders. The interview with Human Resource staff indicated that the Background Investigation Unit (BIU) reports any incidents that are uncovered while conducting the background check relating to sexual harassment and include these incidents in an Administrative Review (AR) that is forwarded on to the IDOC Executive Staff for their review. This also include contractual employees.

115.17 (c): The PAQ indicated that agency policy requires that before it hires any new employees who may have contact with IICs, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes 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. 01.02.107, pages 2-3 state that background investigations shall be completed on person prior to employment or prior to placement in safety sensitive position and on person who provide services for the Department. There shall be two levels of background investigations: a computer criminal history check which include a check of an individual's criminal history through the Law Enforcement Agencies Data System (LEADS) and a complete background investigation which includes a check of LEADS and nine other database queries. Policy indicates a complete background investigation is required for all applicants prior to employment, employees, contractual employees and interns. The policy also indicates that the DOC 0450 is also required for the background investigation. A review of the DOC 0589 confirms that the PREA Questionnaire for Institutional Employers is sent to all prior institutional employers and contains four questions including if the individual was involved in a substantiated sexual abuse allegation and/or a sexual harassment allegation and/or if the individual resigned during a pending investigation of sexual abuse and/or a pending investigation of sexual harassment. The original PAQ indicated there were nineteen people hired in the past twelve months that may have contact with IICs and all nineteen had a criminal background records check completed. The updated PAQ information indicated there were 24 individuals hired in the previous twelve months and all 24 had a criminal background records check. A review of four personnel files of staff hired in the previous twelve months indicated

that 100% had a criminal background records check completed. None of the four staff had a prior institutional employer listed on the application, however the auditor previously reviewed this process at prior IDOC audits (completed at the agency level). The interview with Human Resource staff confirmed that the Background Investigation Unit (BIU) performs a background check on all request for background investigations sent by facilities. In addition, the BIU performs a check of IDOC Intel, work discipline and any PREA related incidents for all employees promoting to Shift Supervisor or a promotion in a Merit Compensation position. The Human Resource staff also stated that they check IDOC Intel and work discipline for employees that have answered "Yes" on the DOC 0450 (PREA self-disclosure). All contractors who have routine access to individuals in custody go through the background process.

115.17 (d): The PAQ stated that agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with IICs. The PAQ indicated that there have been three contracts at the facility within the past twelve months where criminal background record checks were conducted on all staff covered under the contract. 01.02.107, pages 2-3 state that background investigations shall be completed on person prior to employment or prior to placement in safety sensitive position and on person who provide services for the Department. There shall be two levels of background investigations: a computer criminal history check which include a check of an individual's criminal history through the Law Enforcement Agencies Data System (LEADS) and a complete background investigation which includes a check of LEADS and nine other database queries. Policy indicates a complete background investigation is required for all applicants prior to employment, employees, contractual employees and interns. The policy also indicates that the DOC 0450 is also required for the background investigation. There were zero contractors hired in the previous twelve months, however the auditor reviewed this process during prior IDOC audits as all contractor criminal background record checks are completed at the agency level. The Human Resource staff confirmed that all contractors who have routine access to individuals in custody go through the background process.

115.17 (e): The PAQ indicated that agency policy requires that either criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with IICs, or that a system is in place for otherwise capturing such information for current employees. 03.02.108, page 2 states that employees are required to verbally report as soon as possible but within five working days a written report and final disposition to the Background Investigations Unit any arrest, indictment or conviction for a felony or misdemeanor, other than minor traffic offenses such as a parking ticket. The memo from the Background Investigations Unit staff indicated that every applicant processed by the IDOC had fingerprints submitted through the Illinois State Police LEADS/NCIC system. When fingerprints are submitted, a permanent marker is indicated on the entry which enables arrest tracking. If the individual is ever arrested, the nationwide system

generates a direct response to the IDOC Background Investigations Unit which is immediately notified of the arrest. The BIU then contacts the CAO of the facility or program site where the employee/contractor is assigned. The facility provided the auditor examples of employee fingerprint submissions and employee arrest notifications, confirming that the IDOC is notified of any arrests. The interview with Human Resource staff indicated that every applicant processed by the Illinois Department of Corrections Background Investigations Unit has, as part of the background investigations process and as a condition of their employment, fingerprints submitted through the Illinois State Police LEADS/NCIC system. When fingerprints are submitted, a permanent marker is indicated on the entry which enables Arrest Tracking. If the individual is ever arrested, the nationwide system generates a direct response to the Illinois Department of Corrections Background Investigations Unit which is immediately notified of the arrest. The notification includes the individual's name, date of birth, and other pertinent identifying information, as well as the Agency which effected the arrest and the charge(s).

115.17 (f): A review of the DOC 0450 Prison Rape Elimination Act Pre-Employment Self-Report confirms that all staff (new applicant and promotion) are required to fill out the form which contains the following questions: have you engaged in sexual abuse in a prison, jail, lockup, community confinement facility, or other correctional facility, a pretrial detention facility, a juvenile facility, a facility for persons who are mentally ill or disabled or have intellectual disabilities or are chronically ill or handicapped, a facility providing skilled nursing intermediate or long-term care custodial or residential care or other institution as defined in the Civil Rights Institutionalized Persons Act (42 U.S.C. 1997)?; have you been convicted of engaging or attempting to engage in sexual activity in the community that was 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?; and have you been civilly or administratively adjudicated to have engaged 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; and has there ever been any allegation, complaint or finding made against you regarding any incidents of sexual harassment? A review of personnel files for four staff who were hired in the previous twelve months indicated that all four had answered the questions, and none had answered yes. Additionally, the auditor reviewed two staff that were promoted during the previous twelve months. One had the form completed prior to promotion and one did not have the form. The Human Resource staff stated that when an individual applies for employment with IDOC they are required to fill out the DOC 0031, Applicant Information Sheet (AIS). There are numerous questions within the AIS that asks about visiting, corresponding with and living with IDOC offenders. Additionally, the applicant is asked about any contact with Law Enforcement. Applicants and promoting employees are also required to complete the DOC 0450 (PREA self-report). The Human Resource staff member confirmed that staff have a continuing affirmative duty to disclose any previous misconduct. The staff indicated that policy of Standards of Conduct require the employee to disclose misconduct.

115.17 (g): The PAQ indicates that agency policy states that material omissions regarding sexual misconduct or the provision of materially false information is grounds for termination. 03.02.108, page 7 states that any employee who knowingly provides false information, including, but not limited to, false information provided in statements, incident reports, correspondence or an interview shall be subject to disciplinary action, including termination. Additionally, DOC 0450 has a section indicating that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for ineligibility or termination from employment.

115.17 (h): The interview with the Human Resource staff indicated that IDOC routinely provides this information upon request with a signed release of information.

Based on a review of the PAQ, 01.02.107, 03.02.100, 03.02.108, DOC 0450, DOC 0589, the Arrest Tracking Process Memorandum, a review of personnel files for staff and contractors and information obtained from the Human Resource staff interview indicates that this standard appears to require corrective action. The auditor reviewed two staff that were promoted during the previous twelve months. One had the form completed prior to promotion and one did not have the form.

#### Corrective Action

The facility will need to ensure that the DOC 0450 is completed prior to promotions. The facility will need to provide a list of staff promoted during the corrective action period and associated DOC 0450s.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. PREA Preemployment Self Report DOC 0450

	<p>The facility provided the originally requested documentation. The DOC 0450s provided were completed after the date of the staff promoted. As such further corrective action was required.</p> <p>The facility provided over ten examples of staff promoted during the corrective action period. All had completed the DOC 0450 prior to date of promotion.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency Head</li> <li>2. Interview with the Warden</li> </ol> <p>Site Review Observations:</p> <ol style="list-style-type: none"> <li>1. Observations of Modification to the Physical Plant/New Unit</li> <li>2. Observations of Video Monitoring Technology</li> </ol> <p>Findings (By Provision):</p> <p>115.18 (a): The PAQ indicated that the agency/facility has not acquired a new facility or made a substantial expansion or modification to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later. The interview with the Agency</p>

Head indicated that the agency has a zero tolerance and that PREA is taken seriously. He stated that they take safety into consideration when planning or making any substantial modifications. The Agency Head indicated they utilize a multi-facet approach to ensure that everyone at the table is able to discuss any issues or items related to building and modification. He further stated they the agency looks at housing for vulnerable populations to ensure safety. During the tour the auditor confirmed that there were no modifications to the existing facility. The auditor viewed the facility map and confirmed there were no new building or structures. The interview with the Warden confirmed there have been no substantial modifications since the last PREA audit. He did state they have closed down two buildings and have reduced the room size from 8 men to 4 men.

115.18 (b): The PAQ stated that the 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. The PAQ indicated that only operable cameras are currently installed in the visiting room, dietary and on the yard. The interview with the Agency Head confirmed that any use of newly updated or installed monitoring technology would be utilized to assist in enhancing the agency’s ability to protect IICs from sexual abuse. He stated that the agency has increased their video monitoring technology and has updated older technology. He indicated that video monitoring is utilized to review and investigate and also to assist with monitoring. He further stated that they review video after an allegation but they also use video monitoring in a proactive approach. During the tour the auditor observed the facility had video monitoring technology in two areas of the facility. Cameras were not actively monitored and were mainly utilized to assist with investigations. Cameras are remotely monitored/viewed by Internal Affairs, Shift Commanders and administrative staff. The Warden confirmed that when installing or updating video monitoring technology they consider how that technology will protect IICs from sexual abuse. He stated they do not have many cameras, but if they did they would have someone monitor them and they would use the technology for investigations. He stated the video monitoring would be utilized to keep a better eye on everyone and everything.

Based on a review of the PAQ, observations made during the tour and information from interviews with the Agency Head and Warden indicates that this standard appears to require additional information.

<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>



Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Administrative Directive 01.12.120 Investigations of Unusual Incidents
4. Administrative Directive 01.12.112 Preservation of Physical Evidence
5. Memorandum of Understanding with Survivor Services Department Family Resources
6. Investigative Reports
7. Memorandum of Understanding with the Illinois State Police
8. Correspondence with the Illinois State Police

Interviews:

1. Interviews with Random Staff
2. Interview with the PREA Compliance Manager
3. Interview with SAFE/SANE
4. Interviews with Individuals In Custody who Reported Sexual Abuse

Findings (By Provision):

115.21 (a): The PAQ indicated that the agency is responsible for conducting administrative and criminal investigations. Additionally, the PAQ stated that the Illinois State Police is also responsible for conducting criminal investigations. The PAQ indicated that when conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol. 04.01.301, page 10 states that all allegations of sexual abuse or harassment shall be investigated by trained investigators in accordance with 01.12.120. The initial investigative report shall be provided to the Chief Administrative Officer within 24 hours of the onset of the investigation. Policy further states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. 01.12.120, pages 1-2 state that The CAO shall ensure that an internal investigation is conducted by facility staff, or by staff assigned by the Chief of Investigations and Intelligence, on each unusual incident report, if it is determined that further facts are required. The Director or the

respective Deputy Director or Chief may request that the Chief of Operations initiate a Department investigation of any other major incident. Department investigations shall be conducted by the Investigations and Intelligence Unit. 01.12.112 pages 1-2 describe the uniform evidence protocol including preservation and collection. Interviews with thirteen random staff indicated that twelve were aware of and understood the protocol for obtaining usable physical evidence. Additionally, eleven of the thirteen staff stated they knew who was responsible for conducting sexual abuse investigations. Staff stated that Internal Affairs, the State Investigator and/or health services would be responsible for conducting sexual abuse investigations.

115.21 (b): The PAQ indicated that the evidence protocol is not developmentally appropriate for youth as the agency does not house youthful IICs. It further stated that the protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office of Violence Against Women publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adult/Adolescents". Further clarification with the PCM indicated that it was not developed for youth as they do not house youth, however it was developed based on the most recent edition of the DOJ's publication. 01.12.112 indicates that prior to evidence collection the scene shall be secured; evidence shall be collected subsequent of searches, sketches and photographs; evidence shall be handled as little as possible and evidence shall be marked and tagged. The memo from the Chief of Investigations and Intelligence also indicated that all Sexual Assault Evidence Kits will be completed by an outside hospital or outside hospital emergency room with trained medical staff and the hospital completing the kit will be responsible for submitting the kit to the Illinois State Police Division of Forensic Services.

115.21 (c): The PAQ indicated that the facility offers all IICs who experience sexual abuse access to forensic medical examinations at an outside medical facility. The PAQ stated that forensic medical examinations are offered without financial cost to the victim. It further indicated forensic medical examinations are always conducted by SAFE or SANE. The PAQ confirmed that state statute (Illinois Compiled Statutes ILCS) requires forensic medical examination to be performed by SANE/SAFE. 04.01.301, page 9 states that offenders shall not be charged for co-payments for medical treatment, including a forensic medical examination, obtained for alleged sexual abuse. Treatment shall be provided by a certified Sexual Assault Forensic Examiner (SAFE) or a certified Sexual Assault Nurse Examiner (SANE) at a local emergency room as determined by the local facility. The memo from the Chief of Investigations and Intelligence also indicated that all Sexual Assault Evidence Kits will be completed by an outside hospital or outside hospital emergency room with trained medical staff. The original and updated PAQ indicated that during the previous twelve months there were zero forensic medical examinations conducted by a SANE/SAFE and/or medical practitioner. A review of investigations during the previous twelve months confirmed there were zero IICs transported to the local hospital for a forensic medical examination. The auditor contacted Unity Point Trinity Rock Island. The staff advised that they perform forensic medical examinations through their SANE program. The staff advised all exams are performed by SAFE/SANE.

115.21 (d): The PAQ indicated that the facility attempts to make available to the victim a victim advocate from a rape crisis center and the efforts are documented. The PAQ further indicated that if a rape crisis center is not available a qualified staff member from a community-based organization or a qualified agency staff member, however a rape crisis center advocate is always provided. 04.01.301, page 5 states that the PCM shall identify community agencies, including advocacy and crisis organizations, where reports can be made or that provide assistance or support services to staff or offenders in the prevention or intervention of sexual abuse and harassment. Page 8 further states that all response efforts, including efforts to secure advocacy services from a rape crisis center, shall be documented. The facility has a Memorandum of Understanding with the Survivor Services Department of Family Resources, which was signed on September 10, 2021. The MOU states the purpose and scope of the MOU is to establish a joint effort between IDOC and Survivor Services Department Family Resources. to make available to IICs access to an outside entity to provide emotional support services related to sexual abuse, including crisis intervention and sexual assault counseling. The MOU further states that it is understood that face-to-face emotional support will be provided in as confidential a manner as possible or emotional support would be provided through confidential, unmonitored, unrecorded phone calls and shall comply with 735 ILCS 5/8-802.1 "Confidentiality of Statements Made to Rape Crisis Personnel". A review of investigative reports indicated all seven IICs were offered victim advocacy service (including those that were sexual harassment and those that did not meet the definition of sexual abuse or sexual harassment). Four accepted advocacy services per documentation, however at the issuance of the interim report documentation related to these services had not been provided. The interview with the PCM confirmed that if we requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and provides emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews. She stated in the event they would request an advocate she assumes they could be provided one, but she has not had one request since she became the PCM. The PCM further stated that she had never tried to contact the organization but when they attempted to reach out to them during the audit the phone line just beeped and the email was returned to sender. She confirmed they have an MOU with Survivor Services which is the local rape crisis center. Interviews with IICs who reported sexual abuse indicated one was afforded contact with victim advocacy services, but declined them. The other two IICs stated they were not afforded any contact with anyone after they reported sexual abuse.

115.21 (e): The PAQ indicated that as requested by the victim, the victim advocate, qualified agency staff member or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews. 04.01.301, page 5 states that the PCM shall identify community agencies, including advocacy and crisis organizations,

where reports can be made or that provide assistance or support services to staff or offenders in the prevention or intervention of sexual abuse and harassment. Page 8 further states that all response efforts, including efforts to secure advocacy services from a rape crisis center, shall be documented. The facility has a Memorandum of Understanding with Survivor Services Department Family Resources which was signed on September 10, 2021. The MOU states IDOC will follow the Sexual Assault Survivors Emergency Treatment Act (SASETA) when a forensic medical examination is determined by IDOC to be medically and evidentiarily appropriate in accordance with 115.21, and the examination will be provided at no cost to the IIC. It is expected that the treatment hospital will contact a local rape crisis center as may be specified within a memorandum of understanding or other agreement between the treatment hospital's local rape crisis center pursuant to SASETA. IDOC will allow an IIC transported to a treatment hospital for medical forensic services to access crisis intervention and medical advocacy while at the treatment hospital. If the PCM is on duty, and as time and circumstances allow, the PCM shall provide notice to the appropriate rape crisis center of an IIC being transported to a treatment hospital for medical forensic services to allow for an advocate to be dispatched earlier than when the hospital calls upon arrival. The MOU further states that after the forensic services is performed, IDOC will inform the IIC how to contact the rape crisis center so that the IIC can independently decide whether to avail himself or herself of additional rape crisis services. A review of investigative reports indicated all seven IICs were offered victim advocacy service (including those that were sexual harassment and those that did not meet the definition of sexual abuse or sexual harassment). Four accepted advocacy services per documentation, however at the issuance of the interim report documentation related to these services had not been provided. The interview with the PCM confirmed that if we requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and provides emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews. She stated in the event they would request an advocate she assumes they could be provided one, but she has not had one request since she became the PCM. The PCM further stated that she had never tried to contact the organization but when they attempted to reach out to them during the audit the phone line just beeped and the email was returned to sender. She confirmed they have an MOU with Survivor Services which is the local rape crisis center. Interviews with IICs who reported sexual abuse indicated one was afforded contact with victim advocacy services, but declined them. The other two IICs stated they were not afforded any contact with anyone after they reported sexual abuse.

115.21 (f): The PAQ indicated that the agency/facility is not responsible for investigating administrative or criminal investigations of sexual abuse. The agency/facility does conduct sexual abuse investigations, however there are certain criminal investigations that are conducted by the Illinois State Police. The MOU with the Illinois State Police (signed in 2019) indicates that they conduct investigations related to sexual assault involving staff on staff or staff on IIC. A review of documentation

confirmed that the PC has annual correspondence with the Illinois State Police related to the Survey of Sexual Victimization. During that correspondence the Illinois State Police confirm that they follow a uniform evidence protocol and the requirements under this standard.

115.21 (g): The auditor is not required to audit this provision.

115.21 (h): The facility has an MOU with Survivor Services Department Family Resources which is the local rape crisis center with trained/certified victim advocates.

Based on a review of the PAQ, 04.01.301, 01.12.120, 01.12.112, the MOU Survivor Services Department Family Resources, investigative reports, the MOU with the Illinois State Police, the correspondence with the Illinois State Police and information from interviews with the random staff, the PREA Compliance Manager, SAFE/SANE and IIC who reported sexual abuse indicates that this standard appears to require corrective action. A review of investigative reports indicated all seven IICs were offered victim advocacy service (including those that were sexual harassment and those that did not meet the definition of sexual abuse or sexual harassment). Four accepted advocacy services per documentation, however at the issuance of the interim report documentation related to these services had not been provided. The interview with the PCM confirmed that if we requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and provides emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews. She stated in the event they would request an advocate she assumes they could be provided one, but she has not had one request since she became the PCM. The PCM further stated that she had never tried to contact the organization but when they attempted to reach out to them during the audit the phone line just beeped and the email was returned to sender. She confirmed they have an MOU with Survivor Services which is the local rape crisis center. Interviews with IICs who reported sexual abuse indicated one was afforded contact with victim advocacy services, but declined them. The other two IICs stated they were not afforded any contact with anyone after they reported sexual abuse.

#### Corrective Action

The facility will need to work with the local rape crisis center to determine if they are still willing to provide services. The facility will need to develop a way to contact the organization for services. Confirmation of the services will need to be provided to the auditor. Further the facility will need to ensure all IIC victims of sexual abuse are

afforded access to the victim advocate. Appropriate staff will need to be trained on the process. A list of sexual abuse allegations during the corrective action plan and corresponding victim advocacy documentation will need to be provided to the auditor as well.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Communication with Rape Crisis Center
2. List of Sexual Abuse Allegations During the Corrective Action Period
3. Victim Advocacy Documents
4. Training Memorandum on Victim Advocacy Process

The facility provided communication they had with the rape crisis center as well as updated contact information. The auditor contacted the rape crisis center in April.

A training memo was provided to the auditor that outlined the process for affording IICs who report sexual abuse access to a victim advocate. The training memo was signed by appropriate staff to confirm they received and understood the training.

The facility provided a list of sexual abuse allegations during the corrective action period. All three victims declined victim advocacy services.

Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## Auditor Discussion

### Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Administrative Directive 01.12.120 Investigations of Unusual Incidents
4. Memorandum of Understanding with the Illinois State Police/Office of Executive Inspector General
5. Investigative Reports

### Interviews:

1. Interview with the Agency Head
2. Interviews with Investigative Staff

### Findings (By Provision):

115.22 (a): The PAQ indicated that the agency ensures an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. 04.01.301, page 10 states that all allegations of sexual abuse or harassment shall be investigated by trained investigators in accordance with 01.12.120. The initial investigative report shall be provided to the Chief Administrative Officer within 24 hours of the onset of the investigation. Policy further states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. 01.12.120, pages 1-2 state that The CAO shall ensure that an internal investigation is conducted by facility staff, or by staff assigned by the Chief of Investigations and Intelligence, on each unusual incident report, if it is determined that further facts are required. The Director or the respective Deputy Director or Chief may request that the Chief of Operations initiate a Department investigation of any other major incident. Department investigations shall be conducted by the Investigations and Intelligence Unit. The PAQ noted there were eleven allegations reported within the previous twelve months. All eleven resulted in an administrative investigation and one resulted in a criminal investigation. The updated PAQ information indicated there have been seven allegations reported during the previous twelve months, all seven had an administrative investigations completed. None of the seven involved a criminal investigation. A review of documentation indicated there were seven allegations reported during the previous twelve months. Three were sexual abuse, two were

sexual harassment and two did not meet the definition of sexual abuse or sexual harassment. All seven allegations were referred for investigation and all seven had a completed administrative investigation. The interview with the Agency Head confirmed that the agency ensures an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment. He stated the agency has a policy/manual and that all allegations are investigated. He indicated that when an allegation is reported through any of the available channels it is reported to the PCM who then reports it to intel staff. Intel staff complete an investigation and if deemed substantiated it is forwarded for criminal charges. The Agency Head stated that the agency takes all allegations seriously and they prosecute to the fullest extent.

115.22 (b): The PAQ indicated that the agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The PAQ further stated that the policy is published on the agency's website and all referrals for criminal investigations are documented. 04.01.301, page 10 states that all allegations of sexual abuse or harassment shall be investigated by trained investigators in accordance with 01.12.120. The initial investigative report shall be provided to the Chief Administrative Officer within 24 hours of the onset of the investigation. Policy further states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. Additionally, the MOU with the Illinois State Police (signed in 2019) indicates that they conduct investigations related to sexual assault involving staff on staff or staff on IIC. A review of the agency website indicates that it states that IDOC investigates all allegations of offender on offender sexual abuse and staff sexual misconduct. It further states that investigations are initiated by the Investigations Unit at IDOC Headquarters. A review of the seven allegations indicated that all seven were investigated by IDOC investigators. The interviews with the investigators confirmed that all allegations are referred to an investigative agency with legal authority to conduct criminal investigations, unless the activity is clearly not criminal.

115.22 (c): The agency/facility has the authority to conduct both administrative and criminal investigations. The Illinois State Police also have the authority to conduct criminal investigations. 04.01.301 states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. Additionally, the MOU with the Illinois State Police (signed in 2019) indicates that they conduct investigations related to sexual assault involving staff on staff or staff on IIC.

115.22 (d): The PAQ stated that if the agency is not responsible for conducting



administrative or criminal investigations of alleged sexual abuse, and another state entity has that responsibility, this other entity has a policy governing how such investigations are conducted. The agency/facility has the authority to conduct both administrative and criminal investigations. The Illinois State Police also has the authority to conduct criminal investigations. 04.01.301 states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. Additionally, the MOU with the Illinois State Police (signed in 2019) indicates that they conduct investigations related to sexual assault involving staff on staff or staff on IIC.

115.22 (e): The auditor is not required to audit this provision.

Based on a review of the PAQ, 04.01.301, 01.12.120, the MOU with the Illinois State Police, investigative reports, the agency’s website and information obtained via interviews with the Agency Head and the investigator indicate that this standard appears to be compliant.

<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 03.03.102 Employee Training</li> <li>4. Administrative Directives 01.01.101 Administrative Directives</li> <li>5. Administrative Directive 01.02.101 Staff Meeting</li> <li>6. PREA Pre-Service Orientation Training Curriculum</li> <li>7. PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum</li> <li>8. Transgender and Non-Binary Individuals in Custody Setting - A Guide to Rehabilitation, Safety Management and Care</li> <li>9. Supervising Individuals in Custody in the IDOC Women’s Division</li> </ol>

## 10. Sample of Staff Training Records

### Interviews:

#### 1. Interviews with Random Staff

### Findings (By Provision):

115.31 (a): The PAQ indicated that the agency trains all employees who may have contact with IICs on the requirements under this provision. 04.01.301, pages 3-4 state that the PC shall develop or approve standardized modules for training staff. Training shall include, but may not be limited to: the Department's zero tolerance policy; the Department's Sexual Abuse and Harassment Prevention and Intervention Policy; an offender's right to be free from sexual abuse and harassment and to be free from retaliation for reporting sexual abuse and harassment; common signs of sexually abusive or harassing behavior; common signs of being a victim of sexual abuse or harassment; protocol for initial response, including identification and separation of offenders; reporting procedures and preservation of physical evidence of sexual abuse. 03.03.102, page 1 states that the Department shall ensure all new employees receive orientation and pre-service training and all employees receive in-service training on a fiscal year basis. A review of the PREA Pre-Service Orientation Training Curriculum and the PREA -Individual in Custody Sexual Assault Prevention and Intervention Curriculum confirms that both trainings includes information on: the agency's zero-tolerance policy, how to fulfill their responsibilities under the agency's sexual abuse and sexual harassment policies and procedures, the IICs' right to be free from sexual abuse and sexual harassment, the right of the IIC to be free from retaliation for reporting sexual abuse or sexual harassment, the dynamics of sexual abuse and sexual harassment in a confinement setting, the common reactions of sexual abuse and sexual harassment victims, how to detect and respond to signs of threatened and actual sexual abuse how to avoid inappropriate relationship with IICs and how to comply with relevant laws related to mandatory reporting. With regard to how to communicate effectively and professionally with lesbian, gay, bisexual, transgender and intersex IICs, staff are required to complete the Transgender and Non-Binary Individuals in Custody Setting - A Guide to Rehabilitation, Safety Management and Care video. A review of eighteen staff training records indicated that 100% had received PREA training. Interviews with thirteen random staff confirmed that all thirteen had received PREA training. Staff stated they receive training annually during cycle training. All thirteen staff confirmed that the required components under this provision are discussed during the PREA training. Staff stated the training goes over first responder duties and what PREA stands for.

115.31 (b): The PAQ indicated that training is tailored to the gender of IIC at the facility and that employees who are reassigned to facilities with opposite gender are given additional training. 03.03.102, page 4 states that all employees employed at a women's facility shall receive an additional 40 hours of gender responsive and trauma informed training onsite upon hire. Each employee shall then be provided a gender responsive and trauma informed refresher each subsequent year of employment. A review of the Supervising Individuals in Custody in the IDOC Women's Division training curriculum confirms the training includes 83 slides related to trauma informed practices, gender specific programs and services, different level of value of communication for women and health boundaries and professional distance. Additionally, the agency has the Gender Responsibility and Supervising the Female Offender training. East Moline Correctional Center houses adult male IICs and as such additional training was not required or conducted.

115.31 (c): The PAQ indicated that between trainings the agency provides employees who may have contact with IICs with refresher information about current policies regarding sexual abuse and sexual harassment and that staff are provided training annually. 03.03.102, page 4 states that employees shall receive an additional 40 hours of training each subsequent year of employment. 01.01.101, page 7 states that the Policy and Directives Unit shall provide monthly notice of, and make available via the Department Intranet any new or revised directives, rescission notices, or provide a notice of no change. Additionally, 01.02.101 states that administrative and supervisory staff meeting shall be held at least once a month to ensure that lines of two-way communication are established between all levels of supervision and that the meeting will be used for discussing policy and program changes and topics which are of general interest to the group. A review of eighteen staff training records indicated fourteen had PREA training the previous two years. Two staff were new hires and had not yet been at the facility over a year. The two Major's had not completed training as outlined under this provision.

115.31 (d): The PAQ indicated that the agency documents that employees who may have contact with IICs understand the training they have received through employee signatures or electronic verification. 03.03.102, page 6 states that certificates or other verification of training received shall be provided to the Training Coordinator. The certificates or verification of training shall include all information required on the DOC 0200. Additionally, all newly hired staff are required to complete the Acknowledgement of Participation which indicates that the staff has read and understood 04.01.301. A review eighteen staff training records indicated that all eighteen had verification of the completed training via manual signature.

Based on a review of the PAQ, 04.01.301, 03.03.102, 01.01.101, 01.02.101, PREA Pre-Service Orientation Training Curriculum, PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum, Transgender and Non-Binary Individuals in

Custody Setting – A Guide to Rehabilitation, Safety Management and Care training, Supervising Individuals in Custody in the IDOC Women’s Division, a review of a sample of staff training records as well as interviews with random staff indicates that this standard appears to require corrective action. A review of eighteen staff training records indicated fourteen had PREA training the previous two years. Two staff were new hires and had not yet been at the facility over a year. The two Major’s had not completed training as outlined under this provision.

Corrective Action

The facility will need to ensure all Majors have completed recent PREA training. Confirmation will need to be provided.

Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

Additional Documents:

1. Staff Training

The facility provided confirmation that the six facility Major’s completed PREA training, via cycle training, Day 2, during the corrective action period.

Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Administrative Directive 04.01.122 Volunteer Services
4. Administrative Directive 03.03.102 Employee Training
5. Volunteer Services Handbook
6. PREA Pre-Service Orientation Training Curriculum
7. PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum
8. Volunteer and Contractor Training Records

Interviews:

1. Interviews with Volunteers or Contractors who have Contact with Inmates

Findings (By Provision):

Interviews:

1. Interviews with Volunteers or Contractors who have Contact with Individuals In Custody

Findings (By Provision):

115.32 (a): The PAQ indicated that all volunteers and contractors who have contact with IICs have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection and response. 04.01.301, pages 3-4 state that the PC shall develop or approve standardized modules for training staff. Training shall include, but may not be limited to: the Department's zero tolerance policy; the Department's Sexual Abuse and Harassment Prevention and Intervention Policy; an offender's right to be free from sexual abuse and harassment and to be free from retaliation for reporting sexual abuse and harassment; common signs of sexually abusive or harassing behavior; common signs of being a victim of sexual abuse or harassment; protocol for initial response, including identification and separation of offenders; reporting procedures

and preservation of physical evidence of sexual abuse. Page 2 states that the term staff for the purpose of this directive shall mean any Department employee, contracted employee, employee of a vendor or volunteer. 04.01.122, page 3 states that the Facility Volunteer Coordinator shall ensure volunteers receive orientation and training appropriate to the type of volunteer assignment at the facility or program site prior to service. Training shall include, but not be limited to, preparation of an incident report, volunteer rules of conduct and the Department's zero tolerance policy toward all forms of sexual abuse and sexual harassment. The PAQ indicated that 31 volunteers and contractors had received PREA training, which is equivalent to less than 100% of the total volunteers and contractors. The updated PAQ indicated there are 80 volunteers and contractors and all 80 completed PREA training. A review of the PREA Pre-Service Orientation Training Curriculum and the PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum confirms that the trainings discuss responsibilities under the agency's sexual abuse and sexual harassment policy. A review of the Volunteer Handbook confirms that page 19 includes information on the zero tolerance, how to report and red flags. A review of training documents for eight contractors indicated six had documentation that they received PREA training. A review of four volunteer training documents indicated three had completed PREA training. Interviews with two contractors and a volunteer confirmed that they had received information on the agency's sexual abuse and sexual harassment policies.

115.32 (b): The PAQ indicated that the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with IICs. The PAQ stated that all volunteers and contractors with IIC contact are required to complete orientation. Additionally, the PAQ indicates that all volunteers and contractors who have contact with IICs have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed on how to report such incidents. 04.01.301, pages 3-4 state that the PC shall develop or approve standardized modules for training staff. Training shall include, but may not be limited to: the Department's zero tolerance policy; the Department's Sexual Abuse and Harassment Prevention and Intervention Policy; an offender's right to be free from sexual abuse and harassment and to be free from retaliation for reporting sexual abuse and harassment; common signs of sexually abusive or harassing behavior; common signs of being a victim of sexual abuse or harassment; protocol for initial response, including identification and separation of offenders; reporting procedures and preservation of physical evidence of sexual abuse. Page 2 states that the term staff for the purpose of this directive shall mean any Department employee, contracted employee, employee of a vendor or volunteer. 04.01.122, page 3 states that the Facility Volunteer Coordinator shall ensure volunteers receive orientation and training appropriate to the type of volunteer assignment at the facility or program site prior to service. Training shall include, but not be limited to, preparation of an incident report, volunteer rules of conduct and the Department's zero tolerance policy toward all forms of sexual abuse and sexual harassment. A review of the PREA Pre-Service Orientation Training Curriculum and the

PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum confirms that the trainings discuss responsibilities under the agency's sexual abuse and sexual harassment policy. A review of the Volunteer Services Handbook confirms that page 19 includes information on the zero tolerance, how to report and red flags. A review of training documents for eight contractors indicated six had documentation that they received PREA training. A review of four volunteer training documents indicated three had completed PREA training. The two contractors and volunteer confirmed that they received training on PREA, which covered the zero tolerance policy and how/who to report the information to. Both contractors stated they received training during the annual cycle training, which is the same training that staff are required to attend. The volunteer stated he was provided two documents he had to read and sign and it included information on PREA. He stated he had to sign he read the information.

115.32 (c): The PAQ indicated that the agency maintains documentation confirming that volunteers and contractors understand the training they have received. 03.03.102, page 6 states that certificates or other verification of training received shall be provided to the Training Coordinator. The certificates or verification of training shall include all information required on the DOC 0200. Additionally, all newly hired staff are required to complete the Acknowledgement of Participation which indicates that the staff has read and understood 04.01.301. Additionally, 04.01.122, page 3 states that individual volunteer files shall include training documentation including documented orientation and any additional training. Training documentation shall be signed and dated by the volunteer along with the Volunteer Coordinator. A review of training documents confirmed that the nine contractors and volunteers that completed training manually signed that they received and understood the training.

Based on a review of the PAQ, 04.01.301, 04.01.122, 03.03.102, the Volunteer Services Handbook, PREA Pre-Service Orientation Training Curriculum, PREA - Individual in Custody Sexual Assault Prevention and Intervention Curriculum, a review of a sample of contractor training records as well as the interviews with contractors indicate that this standard appears to require corrective action. A review of training documents for eight contractors indicated six had documentation that they received PREA training. A review of four volunteer training documents indicated three had completed PREA training.

Corrective Action

The facility will need to provide the requested training documentation.

	<p>Verification of Corrective Action Since the Interim Audit Report</p> <p>The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.</p> <p>Additional Documents:</p> <ol style="list-style-type: none"> <li>1. Contractor and Volunteer Training</li> </ol> <p>The facility provided the originally requested documentation. All volunteers and contractors were documented with PREA training.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 04.01.105 Facility Orientation</li> <li>4. Administrative Directive Administrative Directive 04.01.111 ADA Accommodations</li> <li>5. Administrative Directive 05.07.101 Reception and Classification Process</li> <li>6. Video Remote Interpreting Information</li> <li>7. Language Interpretation Procedure - Propio Language Services, LLC.</li> <li>8. Individuals In Custody Orientation Manual (Handbook)</li> </ol>



9. PREA Brochure
10. PREA Talking Points/Facts
11. PREA Posters
12. Individuals In Custody Education Records (Offender Orientation Receipt)

Interviews:

1. Interview with Intake Staff

Interviews with Random Individuals In Custody

Site Review Observations:

1. Observations of Intake Area
2. Observations of PREA Posters

Findings (By Provision):

115.33 (a): The PAQ indicated that IICs receive information at the time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse and sexual harassment. The PAQ indicated that 470 IICs received information on the zero-tolerance policy and how to report at intake, which is equivalent to 100% of the IICs who arrived in the previous twelve months. The updated PAQ indicated there were 457 IICs that arrived in the previous twelve months and all 457 received information on the zero tolerance policy and how to report. 04.01.301, page 7 states that during the admission and orientation process, offenders shall be provided with a presentation regarding the Department's Sexual Abuse and Harassment Prevention and Intervention Program, including reporting procedures and available services and the zero tolerance policy. Offenders shall be informed that victims need not name their attacker to receive medical and mental health services. The policy further states that the offender handbook shall include an explanation of reporting procedures and programs and services available to victims or predators of sexual abuse and harassment. A review of the Handbook confirmed that pages 34-37 include information on PREA. The information includes: zero tolerance, definitions of sexual abuse, how to prevent sexual abuse, ways to report (including the outside reporting entity) and victim advocacy information. A review of the PREA Brochure and the PREA Talking Points/Facts indicated they included definitions of sexual abuse and sexual harassment, examples of sexual abuse and sexual harassment, how to prevent sexual abuse and sexual harassment, what to do if sexually abuse and how to report sexual abuse (including the external reporting entity). During the tour the auditor observed the intake process through a demonstration. IICs are not provided any information

upon intake. They receive information through the orientation process, which is completed within five days of arrival at the facility (usually the second day after arrival). IICs are provided the Orientation Manual (Handbook), the PREA Brochure, the PREA Talking Points/Facts page and the PREA Reporting Poster. Staff also show the PREA video and upon completion ask if anyone has any questions. The facility utilizes the PREA Resource Center's new PREA adult comprehensive education video. The video is shown in the vocational classroom on a 42 inch television. The auditor observed the video is available in English and in Spanish and has subtitles in the respective language. The staff do not verbally go over any information with IICs, they provide the documents and show the video. The interview with intake staff indicated that IICs are provided information related to the agency's sexual abuse and sexual harassment policies, including the zero tolerance policy and methods to report, during intake. The staff stated that every IIC that comes into the facility is provided orientation. Each IIC is given an Orientation Manual, PREA Brochure, PREA Talking Points/Facts sheet and the Reporting Poster. The staff indicated these documents are available in English and Spanish. Interviews with 26 IICs indicated 22 were provided information on the agency's sexual abuse and sexual harassment policies. IICs stated the information was in the Handbook they were provided and was posted on the wall. A review of 25 IIC files of those received in the previous twelve months indicated 25 were provided information at intake.

115.33 (b): 04.01.301, page 7 states that during the admission and orientation process, offenders shall be provided with a presentation regarding the Department's Sexual Abuse and Harassment Prevention and Intervention Program, including reporting procedures and available services and the zero tolerance policy. Offenders shall be informed that victims need not name their attacker to receive medical and mental health services. The policy further states that the offender handbook shall include an explanation of reporting procedures and programs and services available to victims or predators of sexual abuse and harassment. The PAQ indicated that 406 IICs received comprehensive PREA education within 30 days of intake. This is equivalent 100% of those received in the previous twelve months whose length of stay was for 30 days or more. The update PAQ indicated there were 418 IICs that arrived in the previous months and stayed for longer than 30 days and that 457 (all those received) had received comprehensive PREA education. A review of the Handbook confirmed that pages 34-37 include information on PREA. The information includes: zero tolerance, definitions of sexual abuse, how to prevent sexual abuse, ways to report (including the outside reporting entity) and victim advocacy information. A review of the PREA Brochure and the PREA Talking Points/Facts indicated they included definitions of sexual abuse and sexual harassment, examples of sexual abuse and sexual harassment, how to prevent sexual abuse and sexual harassment, what to do if sexually abused and how to report sexual abuse (including the external reporting entity). During the tour the auditor had the facility conduct a mock demonstration of the comprehensive PREA education process. Comprehensive PREA education is completed through the orientation process, which is completed within five days of arrival at the facility (usually the second day after arrival). IICs are

provided the Orientation Manual (Handbook), the PREA Brochure, the PREA Talking Points/Facts page and the PREA Reporting Poster. Staff also show the PREA video and upon completion ask if anyone has any questions. The facility utilizes the PREA Resource Center's new PREA adult comprehensive education video. The video is shown in the vocational classroom on a 42 inch television. The auditor observed the video is available in English and in Spanish and has subtitles in the respective language. The interview with intake staff indicated that IICs are provided information on their right to be free from sexual abuse and sexual harassment, their right to be free from retaliation from reporting such incidents and the facility's response to an allegation of sexual abuse. The staff stated that every IIC that comes into the facility is provided orientation. Each IIC is given an Orientation Manual, PREA Brochure, PREA Talking Points/Facts sheet and the Reporting Poster. The staff indicated these documents are available in English and Spanish. Additionally, the staff stated the PREA video is also shown during orientation in the vocational building classroom. The staff stated orientation is completed within two to three days after arrival. Interviews with 26 IICs indicated sixteen were provided information on their right to be free from sexual abuse, their right to be free from retaliation and how to report allegations of sexual abuse and sexual harassment. Most of the IICs stated the information was provided via video during orientation. A review of 25 IIC files of those received in the previous twelve months indicated 25 were provided comprehensive PREA education within 30 days.

115.33 (c): The PAQ indicated that all current IICs at the facility had been educated on PREA within 30 days or were educated by June 30, 2014. Additionally, the PAQ indicated that agency policy requires that IICs who are transferred from one facility to another be educated regarding their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents, to the extent that the policies and procedures of the new facility differ from those of the previous facility. 04.01.301, page 7 states that during the admission and orientation process, offenders shall be provided with a presentation regarding the Department's Sexual Abuse and Harassment Prevention and Intervention Program, including reporting procedures and available services and the zero tolerance policy. Offenders shall be informed that victims need not name their attacker to receive medical and mental health services. The policy further states that the offender handbook shall include an explanation of reporting procedures and programs and services available to victims or predators of sexual abuse and harassment. The interview with intake staff indicated that IICs are provided information on their right to be free from sexual abuse and sexual harassment, their right to be free from retaliation from reporting such incidents and the facility's response to an allegation of sexual abuse. The staff stated that every IIC that comes into the facility is provided orientation. Each IIC is given an Orientation Manual, PREA Brochure, PREA Talking Points/Facts sheet and the Reporting Poster. The staff indicated these documents are available in English and Spanish. Additionally, the staff stated the PREA video is also shown during orientation in the vocational building classroom. The staff stated orientation is completed within two to three days after

arrival. A review of 31 total IIC files indicated that 31 had received comprehensive PREA education.

115.33 (d): The PAQ indicated that IIC PREA education is available in formats accessible to all IICs, including those who are disabled or limited English proficient. 04.01.301, pages 7-8 state that the Department shall provide offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to offender who have limited reading skills. 04.01.111, pages 3-4 indicate that the CAO shall ensure offenders are provide with information regarding ADA disability accommodations and shall establish procedures for offender access to teletypewriter (TTY) and Video Remote Interpreting (VRS) equipment. The policy also indicates that the CAO shall find alternative notification methods for auditory announcements (tactile paging system). 05.07.101, page 2 states that all videos used during orientation shall include closed captioning subtitles and closed captioning utilizing American Sign Language which has been reviewed for accuracy of the interpretation by the Illinois Deaf and Hard of Hearing Commissioner or a qualified interpreter. The policy further states that he department shall reserve the first row of seats during orientation for offenders who are disabled. 04.01.105, page 2 states that for a non-English speaking offender, reasonable efforts shall be made for the orientation to be explained to him or her in a language her or she understands. It further states that offenders shall receive written orientation material and/or translation in their own language and when a literacy problem exists, a staff member shall assist the offender in understanding the materials. The facility also has a contract with Propio Language Services, LLC. This company provides the facility a phone number that they can call that connects the staff member with a translator who can will translate information between the staff member and LEP IIC. The company has interpretation services for over 600 languages. A review of PREA Posters, the Handbook and distributed information confirmed that information can be provided in large font, bright colors, can be read to IICs in terminology that they understand and is available in Spanish. Additionally, pages 26-28 of the Handbook provides information on Americans with Disabilities (ADA) including requesting accommodations, telecommunication equipment and sign language information. A review of six disabled IIC files and four LEP IIC files indicated all ten had signed that they received and understood the PREA information, however all four LEP IICs signed an English acknowledgment form.

115.33 (e): The PAQ indicated that the agency maintains documentation of IIC participation in PREA education sessions. 04.01.105, page 2 states that at the conclusion of the orientation program, each offender shall be requested to sign an Offender Orientation Receipt, DOC 0291, indicating he or she has participated in the orientation program and has obtained a copy of the manual. A review of 31 total IIC files indicated that 31 had received comprehensive PREA education. IICs sign the DOC 0291 confirming they received orientation, which includes PREA.

115.33 (f): The PAQ indicated that the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, IIC handbooks or other written formats. 04.01.301, page 7 states that the offender handbook shall include an explanation of reporting procedures and programs and services available to victims or predators of sexual abuse and harassment. A review of the Handbook and PREA Posters confirmed information is accessible to IICs through these avenues. During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or grievance, by writing to the PREA Coordinator or by sending privileged mail to the John Howard Association. The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. In addition to the Posters, housing units had the PREA Hotline number painted in the housing units. Informal conversation with staff and IICs confirmed that the PREA information has been posted for a while. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only poster with information on the outside reporting entity and the contact information for the victim advocacy service.

Based on a review of the PAQ, 04.01.301, 04.01.105, 04.01.111, 05.07.101, Propio Language Services, LLC. information, Video Remote Interpreting information, the Handbook, PREA Brochure, PREA Talking Points/Facts, PREA Posters, IIC education documents, observations made during the tour as well as information obtained during interviews with intake staff and random IICs indicates that this standard requires corrective action. A review of six disabled IIC files and four LEP IIC files indicated all ten had signed that they received and understood the PREA information, however all four LEP IICs signed an English acknowledgment form.

#### Corrective Action

The facility will need to ensure that all LEP and disabled IICs are provided education in accessible formats. The facility will need to identify all current LEP and disabled IICs and re-educate them using the appropriate accommodations. A copy of the updated

	<p>education will need to be provided to the auditor.</p> <p>Verification of Corrective Action Since the Interim Audit Report</p> <p>The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.</p> <p>Additional Documents:</p> <ol style="list-style-type: none"> <li>1. LEP Individuals In Custody Education</li> </ol> <p>The facility provided documentation confirming that the IICs selected for review by the auditor had received updated PREA education in an accessible format. All three had signed a Spanish acknowledgment.</p> <p>Further, the facility provided eight examples of IICs that arrived during the CAP that were provided accessible PREA education and signed Spanish acknowledgment forms.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 01.12.115 Institutional Investigative Assignments</li> </ol>

4. Prison Rape Elimination Act (PREA) for Investigators Training Curriculum

5. Investigator Training Records

Interviews:

1. Interviews with Investigative Staff

Findings (By Provision):

115.34 (a): The PAQ indicates that agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings. 04.01.301, page 10 states that all allegations of sexual abuse or harassment shall be investigated by trained investigators in accordance with 01.12.120. 01.12.115, page 2 states that the CAO shall ensure that each individual appointed as an investigator be registered for the next available investigator training program within ten days of temporary or permanent assignment as an investigator. Training topics include but are not limited to: investigative techniques, including interviewing sexual abuse victims; crime scene preservation; collection and preservation of evidence, including sexual abuse evidence collection in a confinement setting; proper use of Miranda and Garrity warnings; criteria and evidence required to substantiate a case for administrative action or prosecution referral; and investigative reporting. The agency utilizes their own training for this standard; PREA for Investigators. A review of documentation indicated that four facility/agency staff were documented with the specialized investigations training. A review of seven investigations revealed they were completed by two investigators, both of which had completed the specialized investigator training. The interviews with the investigators confirmed they received specialized training regarding conducting sexual abuse and sexual harassment investigations in a confinement setting. The administrative investigators indicated they received the training during the 40 hour investigator training and the training went over interviews, crime scene, policies, expectations and the whole investigative process. The criminal investigator confirmed he received specialized training and that he attended the 40 hour institutional investigator training, which covers the specialized training for PREA.

115.34 (b): 01.12.115, page 2 states that the CAO shall ensure that each individual appointed as an investigator be registered for the next available investigator training program within ten days of temporary or permanent assignment as an investigator. Training topics include but are not limited to: investigative techniques, including interviewing sexual abuse victims; crime scene preservation; collection and preservation of evidence, including sexual abuse evidence collection in a confinement setting; proper use of Miranda and Garrity warnings; criteria and evidence required to

	<p>substantiate a case for administrative action or prosecution referral; and investigative reporting. The agency utilizes their own training for this standard; PREA for Investigators. A review of the training curriculum confirmed slides 67-118 include the following: techniques for interviewing 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 an administrative investigation. A review of documentation indicated that four facility/agency staff were documented with the specialized investigations training. A review of seven investigations revealed they were completed by two investigators, both of which had completed the specialized investigator training. The interviews with the investigators confirmed that the specialized investigator training included the topics required under this provision: techniques for interviewing 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 an administrative case.</p> <p>115.34 (c): The PAQ indicated that the agency maintains documentation showing that investigators have completed the required training and that four investigators have completed the specialized training. A review of documentation indicated that four facility/agency staff were documented with the specialized investigations training. A review of seven investigations revealed they were completed by two investigators, both of which had completed the specialized investigator training.</p> <p>115.34 (d): The auditor is not required to audit this provision.</p> <p>Based on a review of the PAQ, 04.01.301, 01.12.115, PREA for Investigators Training Curriculum, a review of investigator training records as well as the interviews with the investigators, indicate that this standard appears to be compliant.</p>
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<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 03.03.102 Employee Training</li> </ol>



4. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)
5. Prison Rape Elimination Act: What Healthcare and Mental Health Providers Need to Know Training Curriculum
6. Wexford Health Prison Rape Elimination Act (PREA) and Implementation Training Curriculum
7. Medical and Mental Health Staff Training Records

Interviews:

1. Interviews with Medical and Mental Health Staff

Findings (By Provision):

115.35 (a): The PAQ indicated that the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. 04.01.301, page 4 states that PC shall develop or approve specialized training modules for all full and part-time medical and mental health care practitioners who work regularly in the facilities. Training shall include: detecting and assessing signs of sexual abuse and sexual harassment; preserving physical evidence of sexual abuse; responding effectively and professionally to victims of sexual abuse and sexual harassment; and how and whom to report allegations or suspicions of sexual abuse and sexual harassment. The training is conducted via the Prison Rape Elimination Act: What Healthcare and Mental Health Providers Need to Know and the Wexford Health Overview of the 2003 Prison Rape Elimination Act (PREA) and Implementation. A review of the training curriculums confirmed that they include the following topics: how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how and whom to report allegations or suspicion of sexual abuse and sexual harassment. The PAQ indicated that the facility has 27 medical and mental health staff and that 100% of these staff received the specialized training. The updated PAQ indicated 33 medical and mental health care staff work at the facility and all 33 received the specialized training. A review of seven medical and mental health care staff training records indicated all seven were documented with the specialized medical and mental health training. Interviews with medical and mental health care staff confirm that they received specialized training. They indicated the training is done annually during cycle training through IDOC and also annually through Wexford. The staff confirmed the training required the topics under this provision.

115.35 (b): The PAQ indicated that this provision does not apply as agency medical and mental health care staff do not perform forensic medical examinations. Interviews with medical and mental health staff confirm that they do not perform forensic medical examinations.

115.35 (c): The PAQ indicated that documentation showing the completion of the training is maintained by the agency. A review of seven medical and mental health care staff training records indicated that all seven were documented with the specialized medical and mental health training. Staff complete the training during cycle training (Day 2) and sign that they receive the training.

115.35 (d): 04.01.301, pages 3-4 state that the PC shall develop or approve standardized modules for training staff. Training shall include, but may not be limited to: the Department's zero tolerance policy; the Department's Sexual Abuse and Harassment Prevention and Intervention Policy; an offender's right to be free from sexual abuse and harassment and to be free from retaliation for reporting sexual abuse and harassment; common signs of sexually abusive or harassing behavior; common signs of being a victim of sexual abuse or harassment; protocol for initial response, including identification and separation of offenders; reporting procedures and preservation of physical evidence of sexual abuse. 03.03.102, page 1 states that the Department shall ensure all new employees receive orientation and pre-service training and all employees receive in-service training on a fiscal year basis. A review of the PREA Pre-Service Orientation Training Curriculum and the PREA -Individual in Custody Sexual Assault Prevention and Intervention Curriculum confirm that both trainings includes information on responsibilities in prevention, detection and response as well as the zero tolerance policy and how to report allegations of sexual abuse. A review of seven medical and mental health staff training records indicated that three had received staff training as required under 115.31 and four had received staff training as required under 115.32. It should be noted that those that received training under 115.32 received the same training as those under 115.31.

Based on a review of the PAQ, 04.01.301, 03.03.102, Prison Rape Elimination Act: What Healthcare and Mental Health Providers Need to Know training curriculum, the Wexford Health Overview of the 2003 Prison Rape Elimination Act (PREA) and Implementation training curriculum, a review of medical and mental health care staff training records as well as interviews with medical and mental health care staff indicate this standard appears to be compliant.

<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
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	<b>Auditor Overall Determination:</b> Meets Standard
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## **Auditor Discussion**

### Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)
4. Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494)
5. Individuals In Custody Assessment and Reassessment Documents

### Interviews:

1. Interviews with Staff Responsible for Risk Screening
2. Interviews with Random Individuals In Custody
3. Interview with the PREA Coordinator
4. Interview with the PREA Compliance Manager

### Site Review Observations:

1. Observations of Risk Screening Area
2. Observations of Where Individuals In Custody Files are Located

### Findings (By Provision):

115.41 (a): The PAQ indicated that the agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other IICs. 04.01.301, page 6 states that staff shall make a reasonable effort to ensure the screening and assessment is conducted in consideration of sound confidentiality and sensitivity to the offender. Screening and assessment shall be documented on the Screening for Potential Sexual Victimization or Sexual Abuse, DOC 0494, or an electronic equivalent and shall occur ordinarily within 24 hours of admission or transfer to any facility by staff designated by the Chief Administrative Officer who shall screen each offender for sexually abusive behavior or victimization. Policy further states that the ordinarily within 72

hours of admission or transfer to any facility clinical services staff review the pre-sentence report, statement of facts and other materials in the master file for sexually abusive behavior and victimization. Concerns shall be forwarded to the PCM. Mental health professionals will also inquire whether the offender has been a victim of sexual abuse in the past. During the tour the auditor was provided a demonstration of the initial risk assessment. The initial risk screening is completed in health services in a private office setting. The staff stated that while it was a private setting, a security staff member was in the office during this process. The risk screening is completed via the paper version of the form. Staff complete vitals and a medical assessment and then ask questions about height, weight, prior sexual victimization, prior sexual abusiveness, gender identity, sexual preference, if they were ever incarcerated before, etc. The paper file is then placed in the mental health care staff box for them to review the information. Medical staff indicated they do not have access to some of the information to confirm responses, such as criminal history, but they do review the information available to them. The interviews with the staff responsible for the risk screening confirmed that IICs are screened for their risk of victimization and abusiveness upon arrival at the facility. Interviews with 22 IICs that arrived within the previous twelve months indicated seventeen were asked questions related to risk of victimization and abusiveness.

115.41 (b): The PAQ indicated that the policy requires that IICs be screened for risk of sexual victimization or risk of sexually abusing other IICs within 72 hours of their intake. 04.01.301, page 6 states that staff shall make a reasonable effort to ensure the screening and assessment is conducted in consideration of sound confidentiality and sensitivity to the offender. Screening and assessment shall be documented on the Screening for Potential Sexual Victimization or Sexual Abuse, DOC 0494, or an electronic equivalent and shall occur ordinarily within 24 hours of admission or transfer to any facility by staff designated by the Chief Administrative Officer who shall screen each offender for sexually abusive behavior or victimization. Policy further states that the ordinarily within 72 hours of admission or transfer to any facility clinical services staff review the pre-sentence report, statement of facts and other materials in the master file for sexually abusive behavior and victimization. Concerns shall be forwarded to the PCM. Mental health professionals will also inquire whether the offender has been a victim of sexual abuse in the past. The PAQ noted that 469 IICs were screened within 72 hours over the previous twelve months. This indicates that 100% of those whose length of stay was for 72 hours or more received a risk screening within 72 hours. The updated PAQ indicated there have been 457 IICs that arrived and stayed for over 72 hours and all 457 had an initial risk screening completed. A review of 25 IIC files of those that arrived within the previous twelve months indicated that all 25 had an initial risk screening completed, 24 of which were within 72 hours. The interviews with the staff responsible for the risk screening confirmed that IICs are screened for their risk of victimization and abusiveness within 72 hours. Interviews with 22 IICs that arrived within the previous twelve months indicate seventeen were asked the questions related to risk of victimization and abusiveness when they first arrived at the facility.

115.41 (c): The PAQ indicated that the risk screening is conducted using an objective screening instrument. A review of the Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494) indicates that IICs are asked about identified or perceived sexual orientation, gender identity and history or sexual victimization. Additionally, the Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494) indicates that general information such as age, height, weight, number of incarcerations, non-violent or violent criminal history, disabilities, education level, socioeconomic status, immigrant status/language, history or sexual abusive behavior, criminal history of sexual abuse in the community, history of domestic violence, security threat group affiliation and history or institutional assaultive/violent behavior are factored into the risk screening assessment tool. Each question has appropriate responses that correspond to a number. The numbers are added up at the end of the victimization section and predatory section and the total number determines where the IIC falls on the continuum. The continuum ranges from not likely, likely, moderately likely to highly likely for both vulnerable and predatory. The IICs who fall in the highly likely or moderately likely range are then reviewed for the official vulnerable or predatory designation. The DOC 0949 also states that the evaluator may refer an individual in custody on the continuum, but if the individual falls into the likely or not likely range, a rationale for the referral should be documented.

115.41 (d): A review of the Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494) indicates that the tool has two sections; vulnerability and predatory. The vulnerability section includes general information such as age, height, weight, number of incarcerations, non-violent or violent criminal history, disabilities (developmental, mental illness and physical), education level, socioeconomic status and immigrant status/language. IICs are also asked about identified or perceived sexual orientation, gender identity and history or sexual victimization. The IIC is also asked about his/her own perception of their safety at the time of the screening. Each question has appropriate responses that correspond to a number. The numbers are added up at the end of the victimization section and the total number determines where the IIC falls on the continuum. The continuum ranges from not likely, likely, moderately likely to highly likely for vulnerability. The IICs who fall in the highly likely or moderately likely range are then reviewed for the official vulnerable designation. The interviews with the staff responsible for the risk screening indicated the risk screening is completed via the risk screening tool which includes questions about age, height, weight, gender identity, sexual preference, prior sexual victimization, disabilities, grade level, socioeconomic status, prior incarcerations, gang affiliation, non-violent offenses and perception of vulnerability. Staff indicated they ask the questions on the risk screening form, which is mostly yes or no responses. Both staff confirmed the required elements under this provision are included on the risk screening form.

115.41 (e): A review of the Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494) indicates information including, history or sexual abusive behavior, criminal history of sexual abuse in the community, history of domestic violence, security threat group affiliation and history or institutional assaultive/violent behavior are factored into the risk screening assessment tool. Each question has appropriate responses that correspond to a number. The numbers are added up at the end of the predatory section and the total number determines where the IIC falls on the continuum. The continuum ranges from not likely, likely, moderately likely to highly likely for predatory. The IICs who fall in the highly likely or moderately likely range are then reviewed for the official predatory designation. The interviews with the staff responsible for the risk screening indicated the risk screening is completed via the risk screening tool which includes questions about age, height, weight, gender identity, sexual preference, prior sexual victimization, disabilities, grade level, socioeconomic status, prior incarcerations, gang affiliation, non-violent offenses and perception of vulnerability. Staff indicated they ask the questions on the risk screening form, which is mostly yes or no responses. Both staff confirmed the required elements under this provision are included on the risk screening form.

115.41 (f): The PAQ indicated that the policy requires that the facility reassess each IIC's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the IIC's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. 04.01.301, page 6 states that within 30 days of admission or transfer to the facility, each offender, including any offender returned to Reception and Classification as a parole or mandatory supervised release violator, shall be screened again for sexually abusive behavior or victimization and potentially predator or vulnerable offender identification based upon any additional, relevant information received by the facility since the intake screening. The PAQ noted that 406 IICs were reassessed within 30 days, which is equivalent to 100% of the IICs who arrived and stayed longer than 30 days. The updated PAQ indicated there have been 418 IICs that arrived in the previous twelve months and stayed for 30 days or more and all 418 had a risk reassessment completed. During the tour the auditor also have staff demonstrate how they complete the risk reassessment. Clinical staff meet with the IIC within 30 days and complete the reassessment in a private office setting. The staff goes through the paper version of the questionnaire. Staff ask about disabilities, gender identity, sexual preference, prior sexual victimization, height, grade level and socioeconomic status. Staff enter information into O360 and shred the paper version of the form. Staff review information in O360 as well to verify responses. The interviews with the staff responsible for the risk screening indicated that IICs are reassessed within 30 days. Interviews with 22 IICs that arrived within the previous twelve months indicated two had been asked questions related to their risk of victimization and abusiveness more than once. A review of 25 IIC files of those that arrived in the previous twelve months indicated 25 had a reassessment. 23 of the 25 were completed within 30 days of arrival.

115.41 (g): The PAQ indicated that the policy requires that an IIC's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the IIC's risk of sexual victimization or abusiveness. 04.01.301, page 6 states screening and assessment shall occur when warranted due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the offender's risk of sexual victimization or abusiveness. The interviews with staff responsible for the risk screening confirmed that IICs are reassessed when warranted due to referral, request, incident of sexual abuse or receipt of additional information. Interviews with 22 IICs that arrived within the previous twelve months indicated two had been asked questions related to their risk of victimization and abusiveness more than once. A review of 25 IIC files of those that arrived in the previous twelve months indicated 25 had a reassessment. A review of investigations indicated three were sexual abuse allegations however none were an allegation that would warrant a reassessment.

115.41 (h): The PAQ indicated that policy prohibits disciplining IICs for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the IIC has a mental, physical, or developmental disability; (b) whether or not the IIC is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not the IIC has previously experienced sexual victimization; and (d) the IIC's own perception of vulnerability. The 04.01.301, page 7 states individuals in custody shall not be disciplined for refusing to answer, or not disclosing complete information in response to questions asked during the screening for potential sexual victimization or sexual abuse. The interviews with the staff responsible for risk screening confirmed that IICs are not disciplined for refusing to answer or for not fully disclosing information any of the risk screening questions.

115.41 (i): 04.01.301, page 6 states that staff shall make a reasonable effort to ensure the screening and assessment is conducted with consideration of sound confidentiality and sensitivity to the offender. The interview with the PREA Coordinator indicated that the agency has outlined who should have access to an IIC's risk assessment within the facility in order to protect sensitive information from exploitation. He stated screening information is provided on a need-to-know basis to make informed placement decisions as well as predator/vulnerable designations. Risk screening information is maintained in the electronic Offender 360 program and/or in the IIC's master file. Master files are maintained in records which is staffed Monday through Friday and the area is locked when not staffed. Access to the master file is to those with a need to know. During the tour the auditor had a security staff member pull up the electronic system to see what was able to be viewed. The staff was able to view the questions and the response of each IIC's risk assessment. During the interim report period the PREA Coordinator corrected this issue. The system was previously restricted and the agency retracted the restriction due to a technical issue. Once it was identified that access was again available to all staff, the PC took immediate action. The auditor was provided confirmation during the interim report period that

the restrictions were once again implemented. The auditor was also able to test the restrictions during another IDOC audit that was conducted after East Moline's on-site portion of the audit. The PCM stated that only a handful of people have the permissions to view the risk screening information, including those who complete the risk assessments. The staff responsible for risk screening confirmed that the agency has outlined who should have access to the risk screening information so that sensitive information is not exploited.

Based on a review of the PAQ, 04.01.301, the PREA Manual, DOC 0494, a review of IIC files and information from interviews with the PREA Coordinator, PREA Compliance Manager, staff responsible for conducting the risk screenings and random IICs indicate that this standard requires corrective action. The initial risk screening is completed in health services in a private office setting. The staff stated that while it was a private setting, a security staff member was in the office during this process. Medical staff indicated they do not have access to some of the information to confirm responses, such as criminal history, but they do review the information available to them. Interviews with 22 IICs that arrived within the previous twelve months indicated two had been asked questions related to their risk of victimization and abusiveness more than once.

#### Corrective Action

The facility will need to reevaluate the initial risk screening process. Initial risk assessments need to be completed in a confidential setting. Additionally, the initial risk assessment should include a file review in addition to the self-disclosure. Once the process is established, appropriate staff will need to be trained. A process memo and a copy of the training will need to be provided. The facility will need to review the risk reassessment process to ensure it is being conducted properly. An assurance memo will need to be provided.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training



	<p>2. Assurance Memorandum</p> <p>The facility provided training that was completed with the staff on the requirement of completing risk assessments in a private setting as well as the requirement of a file review to ensure all information is complete and accurate. Staff signatures were provided confirming they received and understood the training.</p> <p>Additionally, a training memo was provided that outlined the risk reassessment process. Staff signatures were provided confirming receipt of the training. The facility also provided an assurance memo that advised that the reassessment process was reviewed and was being completed as outlined by policy and procedure.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 04.03.104 Evaluation, Treatment and Correctional Management of Transgender Offenders</li> <li>4. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>5. Housing Assignments of Individuals In Custody at Risk of Sexual Victimization and/or Sexual Abusiveness</li> <li>6. Transgender/Intersex Housing Determination Documents</li> <li>7. LGBTI Housing Assignments</li> </ol> <p>Interviews:</p>

1. Interviews with Staff Responsible for Risk Screening
2. Interview with PREA Coordinator
3. Interview with PREA Compliance Manager
4. Interviews with Gay, Lesbian and Bisexual Individuals In Custody

Site Review Observations:

1. Shower Area in Housing Units

Findings (By Provision):

115.42 (a): The PAQ indicated that the agency/facility uses information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those IICs at high risk of being sexually victimized from those at high risk of being sexually abusive. 04.01.301, page 6 states that any indication of sexually abusive behavior, victimization or potential victimization in a correctional setting identified at a Reception and Classification Center or any assigned facility shall be referred to the facility PREA Compliance Manager. The PCM shall promptly review any referrals to assess whether an offender should be identified as a predator or vulnerable offender using the DOC 0494 and make recommendations regarding safety consideration and treatment or counseling needs. Page 7 further states that an offender identified as vulnerable shall not be housed with an offender identified as a predator. Prior to housing an offender identified as vulnerable or an offender identified as a predator, the proposed housing assignment shall be reviewed and approved by the Chief Administrative Officer in consultation with the facility PCM. The interview with the PREA Compliance Manager indicated that information from the risk screening is utilized to identify any concerns related to predator or vulnerable and mental health referrals. She stated the information is utilized to help them navigate the IICs' needs and how the facility should house/place the IIC. The interviews with the staff responsible for the risk screening indicated that information from the risk screening is utilized immediately to determine if there are any concerns or immediate mental health needs. The staff further stated the information is utilized mostly for housing individuals appropriately. A review of documentation confirmed the facility did not house any individuals identified as predator. The facility did house individual identified as vulnerable. Determinations were made based on the designation as well as other classification factors.

115.42 (b): The PAQ indicated that the agency/facility makes individualized

determinations about how to ensure the safety of each IIC. 04.01.301, page 6 states that any indication of sexually abusive behavior, victimization or potential victimization in a correctional setting identified at a Reception and Classification Center or any assigned facility shall be referred to the facility PREA Compliance Manager. The PCM shall promptly review any referrals to assess whether an offender should be identified as a predator or vulnerable offender using the DOC 0494 and make recommendations regarding safety consideration and treatment or counseling needs. Page 7 further states that an offender identified as vulnerable shall not be housed with an offender identified as a predator. Prior to housing an offender identified as vulnerable or an offender identified as a predator, the proposed housing assignment shall be reviewed and approved by the Chief Administrative Officer in consultation with the facility PCM. The interviews with the staff responsible for the risk screening indicated that information from the risk screening is utilized immediately to determine if there are any concerns or immediate mental health needs. The staff further stated the information is utilized mostly for housing individuals appropriately.

115.42 (c): The PAQ indicated that the agency/facility makes housing and program assignments for transgender or intersex IICs in the facility on a case-by-case basis. 04.03.104, page 7 indicates that transgender, intersex and gender incongruent offenders shall not be assigned to gender-specific facilities based solely on their external genital anatomy. The Transgender Administrative Committee (TAC) shall make individualized determinations about how to ensure the safety of each offender including considering transfer from one gender-specific facility to an opposite gender facility and specifically the gender of staff which will perform searches of the offender. The determination shall consider, on a case-by-case basis, whether specific placement ensure the offender's health and safety, and whether the placement would present management or security concerns. The agency as a whole houses approximately 150 transgender IICs. Currently the agency houses nine transgender female IICs at female facilities and zero transgender male IICs at male facilities. The review of meeting minutes for four TAC meetings confirms that housing is reviewed on a case-by-case basis for each IIC. The interview with the PCM indicated that gender identity is not a category they look at for housing. She stated that they are housed based on their score and that for programming they are placed on a waitlist which is determined based on release date. She stated they have not had a transgender or intersex individual in a long time but they would consult with the assignment office to ensure the individuals safety. She stated they review any assignments to ensure the health and safety of the IIC. She further confirmed they would review if the placement would present any security or management decisions. The PCM additionally stated that male and female housing assignments are determined at the agency level. There were zero transgender or intersex IICs housed at the facility during the on-site portion of the audit and as such no interviews were conducted.

115.42 (d): 04.03.104, page 7 states that a review of each transgender, intersex and gender incongruent offender's placement and programming assignments shall be conducted by the facility twice annually to review any threats to safety experienced or posed by the offender. 04.03.104, page 7 states that a review of each transgender, intersex and gender incongruent offender's placement and programming assignments shall be conducted by the facility twice annually to review any threats to safety experienced or posed by the offender. The agency as a whole houses approximately 150 transgender IICs. The facility did not house any transgender IICs, however the auditor has reviewed biannual assessments across numerous facilities within the IDOC during the audit cycle. A review of documentation for eleven transgender IICs confirmed that all eleven were documented with biannual assessments via DOC 0700. These were completed by the TAC. The PCM stated transgender and intersex IICs are reviewed on an as needed basis. The staff responsible for the risk screening were unsure if transgender and intersex IICs were reassessed at least twice a year. While the PCM and risk screening staff were unaware of the biannual assessment requirements, these are completed at the agency level, not the facility level. The biannual assessments are completed by the TAC and as such facility staff may not be familiar with the process.

115.42 (e): 04.03.104, page 7 states that decisions shall be made by the TAC on a case-by-case basis with serious consideration given to circumstances including, but not limited to, the following: the offender's perception of whether a male or female facility is safest for him or her, as well as the preferred gender of staff to perform searches. The interviews with the PCM and staff responsible for the risk screening indicated that transgender and intersex IICs' views with respect to their safety are given serious consideration. There were zero transgender or intersex IICs housed at the facility during the on-site portion of the audit and as such no interviews were conducted.

115.42 (f): 04.03.104, page 9 states that transgender, intersex and gender incongruent offenders shall be allowed the same frequency of showers in accordance with his or her classification. Showers shall be separated and private from other offenders. During the tour the auditor observed that showers, including the infirmary/medical shower provided privacy through curtains. The interviews with the PCM and the staff responsible for risk screening confirmed that transgender and intersex IICs are afforded the opportunity to shower separately. The PCM stated that transgender and intersex IICs are given the opportunity to shower separately via a pass to shower in medical. There were zero transgender or intersex IICs housed at the facility during the on-site portion of the audit and as such no interviews were conducted.

115.42 (g): 04.03.104, page 7 states that transgender, intersex and gender incongruent offenders shall not be assigned to gender specific facilities based solely on their external genital anatomy. Additionally, the PREA Manual, pages 27-28

indicate that the agency shall not place lesbian, gay, bisexual, transgender, or intersex IICs in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such IICs. The interview with the PC confirmed that the agency is not subject to a consent decree and that there is not a dedicated facility for LGBTI IICs. He further stated placement decisions are made to ensure the safety and security of all individuals in custody. Facility, housing unit and cell assignments are made on a case by case basis and housing individuals strictly by gender identity or sexual orientation is prohibited. The PCM confirmed that the agency does not have a consent decree and that LGBTI IICs are not placed in dedicated facilities, units or wings solely because of their identification or status. Interviews with two LGB IICs confirmed both did not feel the facility places LGBTI IICs in dedicated facilities, units, or wings solely on the basis of such identification or status. A review of housing assignments for LGB IICs confirmed they were housed across numerous different housing units at the facility, confirming that LGBTI IICs were not placed in one dedicated unit or wing.

Based on a review of the PAQ, 04.01.301, 04.03.104, the PREA Manual, IICs at risk of sexual abusiveness and sexual victimization housing determinations, transgender or intersex IIC house determinations, transgender or intersex biannual assessments, LGBTI IIC housing assignments, observations made during the tour and information from interviews with the PC, PCM, staff responsible for conducting the risk screening and LGBTI IICs, indicates that this standard appears to be compliant.

<b>115.43 Protective Custody</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 05.15.100 Restrictive Housing</li> <li>4. Individuals In Custody at High Risk of Victimization Housing Assignments</li> </ol>

Interviews:

1. Interview with the Warden
2. Interview with Staff who Supervise Individuals In Custody in Segregated Housing

Site Review Observations:

1. Observations in the Segregated Housing Unit

Findings (By Provision):

115.43 (a): The PAQ indicated that the agency has a policy prohibiting the placement of IICs 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. The original and updated PAQ noted that there were zero IICs at high risk of victimization that were placed in involuntary segregated housing in the past twelve months. 04.01.301, page 7 states that an offender identified as vulnerable shall not be housed in a segregated status for the sole purpose of providing protective custody unless no other means of separation can be arranged. The placement shall require the approval of the Deputy Director or Agency PREA Coordinator (no designee) and shall only continue until an alternative means of separation can be provided and such placement in segregation shall not ordinarily exceed a period of 30 days. The interview with the Warden confirmed that agency policy prohibits placing IICs at high risk of sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and it is determined that there are not alternative means of separation from likely abusers. A review of housing assignments for current IICs at high risk of sexual victimization confirmed that none of the IICs identified as vulnerable were involuntarily segregated due to risk of victimization.

115.43 (b): During the tour the auditor observed the segregated housing unit. The segregated housing unit was a two tiered area with a hearing room and a separate outdoor recreation area. The hearing room was also utilized for any indoor recreation. PREA Reporting Posters were observed in English and Spanish on the bulletin boards. IICs are provided out of cell time through recreation, showers and visitation. Showers are three days a week and recreation is offered two times a day. Phone access is provided once a week. Mail and grievances can be placed in a locked box when out of the cell or can be provided to staff. The interview with the staff who supervise IICs in segregated housing confirmed that IICs at high risk of sexual victimization who are involuntary segregated would have access to programs, privileges and work opportunities to the extent possible. The staff stated that they do not place high risk

IICs in involuntary segregated housing as they do not punish the individuals. He stated segregated housing would be utilized as a last resort and that they typically place the abuser or potential abuser in segregated housing instead. The staff further stated that if access was restricted they would document the restrictions on the activity sheet and via an incident report. There were no IICs identified to be in segregated housing due to their risk of victimization and as such no interviews were conducted.

115.43 (c): The PAQ indicated there were zero IICs at risk of sexual victimization who were assigned to involuntary segregated housing due to their risk of sexual victimization. 04.01.301, page 7 states that an offender identified as vulnerable shall not be housed in a segregated status for the sole purpose of providing protective custody unless no other means of separation can be arranged. The placement shall require the approval of the Deputy Director or Agency PREA Coordinator (no designee) and shall only continue until an alternative means of separation can be provided and such placement in segregation shall not ordinarily exceed a period of 30 days. The interview with the Warden confirmed that IICs would only be placed in involuntary segregated housing until an alternative means of separation from likely abuser(s) could be arranged. He stated that individuals would not remain in segregated housing more than a day or so and that they could conduct an emergency transfer if needed. The interview with the staff who supervises segregated housing confirmed that they do not place high risk IICs in segregated housing and they if they did it would only be until they could find alternative housing. The staff stated they would typically find a different housing unit to utilize rather than segregated housing. The staff further stated while they would not place a high risk IIC in involuntary segregated housing but the maximum amount of time someone would be involuntarily segregated under a rare circumstance would be no more than six days (time it would take to transfer one of the IICs). There were no IICs identified to be in segregated housing due to their risk of victimization and as such no interviews were conducted.

115.43 (d): The PAQ indicated there were zero IICs at risk of sexual victimization who were held in involuntary segregated housing in the past twelve months who had both a statement of the basis for the facility's concern for the IIC's safety and the reason why alternative means of separation could not be arranged. A review of housing assignments for current IICs at high risk of sexual victimization confirmed that none of the IICs identified as vulnerable were involuntarily segregated.

115.43 (e): The PAQ indicate that if an IIC was placed in segregation due to risk of victimization, they would be reviewed every 30 days to determine if there was a continued need for the IIC to be separated from the general population. 04.01.301, page 7 states that an offender identified as vulnerable shall not be housed in a segregated status for the sole purpose of providing protective custody unless no

other means of separation can be arranged. The placement shall require the approval of the Deputy Director or Agency PREA Coordinator (no designee) and shall only continue until an alternative means of separation can be provided and such placement in segregation shall not ordinarily exceed a period of 30 days. Additionally, 05.15.100, page 6 states that a Restrictive Housing Review Committee (RHRC) shall be established at each facility with restrictive housing. The committee shall review the status of each individual in custody's placement into restrictive housing every seven days for the first 60 days and at least every 30 days thereafter, unless more frequently if clinically indicated. The interview with the staff who supervise IICs in segregated housing confirmed that IICs would be reviewed at least every 30 days for their continued need for placement in involuntary segregated housing. Staff stated IICs are reviewed weekly in segregated housing. There were no IICs identified to be in segregated housing due to their risk of victimization and as such no interviews were conducted.

Based on a review of the PAQ, 04.01.301, 05.15.100, high risk IIC housing assignments, observations from the facility tour as well as information from the interviews with the Warden and staff who supervise IICs in segregated housing indicates this standard appears to be compliant.

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>3. Memorandum of Understanding with the John Howard Association (JHA)</li> <li>4. TRUST Act Memorandum</li> <li>5. Individuals In Custody Orientation Manual (Handbook)</li> <li>6. PREA Posters</li> <li>7. PREA Reporting Posters</li> </ol> <p>Interviews:</p>



1. Interviews with Random Staff
2. Interviews with Random Individuals In Custody
3. Interview with the PREA Compliance Manager

Site Review Observations:

1. Observation of Posted PREA Reporting Information
2. Testing of Internal Reporting Hotline
3. Testing of the External Reporting Entity

Findings (By Provision):

115.51 (a): The PAQ indicated that the agency has established procedures allowing for multiple internal ways for IICs to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other IICs or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents. The PREA Manual, page 29 states that offenders shall be encouraged to report allegations to staff at all levels. Offenders shall be provided with avenues of internal reporting, including, but not limited to, a telephone hotline maintained by the Investigations and Intelligence Unit, or by mail to an outside entity (e.g. John Howard Association). Offenders shall be provided information on reporting mechanisms as noted in section 115.33. A review of additional documentation to include the Handbook and PREA Posters indicated that they outline methods for reporting. These methods include: telling any staff member; calling the hotline, writing to the PC, to the John Howard Association (outside reporting entity) and/or sending a note, grievance or request slip. A review of the PREA Brochure and the PREA Talking Points/Facts indicated they included definitions of sexual abuse and sexual harassment, examples of sexual abuse and sexual harassment, how to prevent sexual abuse and sexual harassment, what to do if sexually abuse and how to report sexual abuse (including the external reporting entity). During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or grievance, by writing to the PREA Coordinator or by sending privileged mail to

the John Howard Association. In addition to the Posters, housing units had the PREA Hotline number painted in the housing units. The auditor called the internal PREA hotline on October 2, 2023 and left a message to test functionality. IICs are advised to select English or Spanish upon contact with the hotline. Initial phone instructions are provided in English and Spanish, however the hotline instructions/directions are only available in English. The auditor received confirmation from the PC on October 2, 2023 that the call was received and forwarded to him. IICs have access to the phones most of the day. The internal PREA hotline is accessible on all phones but does require an IIC number. IICs in segregated housing have access to the phones once a week. The auditor also tested the written reporting process. The auditor had an IIC assist with filling out a grievance on October 2, 2023. The auditor submitted the grievance via the grievance box in the housing unit. The auditor was provided confirmation on October 5, 2023 that the grievance was received and would be processed per policy if it was a report of sexual abuse or sexual harassment. Interviews with 26 IICs were aware of at least one method to report sexual abuse and sexual harassment. Most IICs indicated they would report through staff, a slip (written) and the PREA hotline. Interviews with thirteen random staff indicate that IICs can report through the hotline, staff, in writing and through a third party.

115.51 (b): The PAQ stated that the agency provides at least one way for IICs to report sexual abuse to a public or private entity or office that is not part of the agency. Additionally, the PAQ indicated that the facility does not house IICs solely for civil immigration purposes. The agency has an MOU with the John Howard Association. The MOU states John Howard Association will allow IDOC to identify JHA within IIC orientation materials and prison posting as one way for IICs to report sexual abuse or sexual harassment to an entity that is not part of the agency, and that is able to receive and forward IIC reports of sexual abuse or harassment to Agency official for investigation, allowing the IIC to remain anonymous, upon request. The MOU further provides additional responsibilities for JHA and IDOC. The PREA Manual, page 29 indicates that offenders shall be provided contact information to the John Howard Association to make such reports. This information shall be available in the facility orientation manual. A review of the Handbook and PREA Posters confirmed that IICs can report externally to the John Howard Association. The Handbook (pages 34-37) states that IICs can report through an independent outside entity, the John Howard Association of Illinois (JHA). The Handbook indicates that JHA has privileged mail status. It also states that IICs can remain anonymous and provides direction to state in the letter that the IIC does not want his/her name to be included. The PREA Poster states that IICs can report via privileged mail to the John Howard Association through the PO Box in Chicago, Illinois. A review of the PREA Brochure and the PREA Talking Points/Facts indicated they included definitions of sexual abuse and sexual harassment, examples of sexual abuse and sexual harassment, how to prevent sexual abuse and sexual harassment, what to do if sexually abuse and how to report sexual abuse (including the external reporting entity). During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters

(PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation. Reporting mechanisms on the Posters included: to any staff person, via the PREA Hotline, through a note, request slip or grievance, by writing to the PREA Coordinator or by sending privileged mail to the John Howard Association. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only posted information on the outside reporting entity. During the tour the auditor observed that IICs are able to place outgoing mail in any of the locked boxes around the facility, including in the housing units. None of the drop boxes were specific to sexual abuse or sexual harassment allegations or information. The interview with the mailroom staff indicated that outgoing mail that is regular mail comes to them unsealed. The mail is read and inspected for contraband and is then sealed and sent out. Legal mail comes sealed and is not read or inspected. The mailroom staff stated that the incoming mail process starts with separating and prioritizing (i.e. legal or regular). Regular mail is opened by staff who go through it, scan it and ensure it does not contain any contraband. IICs are then given the original documents. Legal mail is not opened by staff and is sent into the facility for a Sergeant to deliver to the IIC. The IIC opens the legal mail in the presence of staff. The mailroom staff stated that mail to and from JHA is treated like legal/privileged mail. The auditor also tested the outside reporting mechanism via a letter to the John Howard Association at a prior IDOC audit. The auditor obtained an envelope and sent a letter to the John Howard Association on January 10, 2023. The auditor obtained assistance from an IIC to utilize his name and number on the return address. The letter was placed in the outgoing US mail box by the IIC. While a return name and number is required, the mail staff do not open this mail and as such IICs are able to remain anonymous within the letter. The John Howard Association is utilized for numerous services and they are not just an organization to report sexual abuse. The auditor received confirmation on January 20, 2023 that the letter was received by the John Howard Association. A copy of the letter that was mailed was forwarded back to the auditor as well as the confirmation from John Howard Association staff that the IIC can remain anonymous. The interview with the PCM indicated that information is posted that advises they can write to the John Howard Association. She stated they have the address to write to and that she is not exactly sure how the information gets back to the facility but she knows it is provided to the Warden. It should be noted that the information is provided from JHA to the PC who then in turns provides it to the facility for investigation. Interviews with 26 IICs indicated twelve were aware of an outside reporting entity and eleven were aware they could anonymously report. While the IICs were not aware of the outside reporting mechanism, the information was observed throughout the facility on the PREA Poster and was contained in the Handbook. The facility does not house IICs detained solely for immigration services and as such this part of the provision is not applicable.

115.51 (c): The PAQ indicated that the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. It further indicated that staff are required to document verbal reports immediately. 04.01.301, page 10 states that any alleged sexual abuse or harassment shall be reported through chain of command as an unusual incident in accordance with 01.12.105. The PREA Manual, page 29 further states that staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports. During the tour, the auditor asked staff to demonstrate how they submit a written report. Staff indicated if they received a verbal report they would complete an incident report. The staff indicated they fill out the paper incident report and then provide it to the Sergeant or Lieutenant. Staff confirmed and demonstrated that forms are available in the housing units. Further, the staff confirmed that they can privately report directly to the Shift Commander or to Internal Affairs. Interviews with 26 IICs indicate that 24 knew they could report verbally and/or in writing to staff and all 26 knew they could report through a third party. Interviews with thirteen staff indicate that IICs can report verbally, in writing, anonymously and through a third party. The staff stated if an IIC reported verbally they would document it in writing immediately as soon as they ensured the individual was safe. A review of investigations indicated four were reported verbally and three were reported via the hotline. All four verbal reports were documented in a written incident report by the staff member receiving the report. Further, the three that were reported via hotline also had written reports by staff.

115.51 (d): The PAQ indicates the agency has established procedures for staff to privately report sexual abuse and sexual harassment of IICs. It further states that staff can report through any of the reporting mechanisms offered to individuals in custody. The PAQ indicated that staff are informed of this method through PREA refresher trainings and postings around the facility. The PREA Manual, page 29 states that the agency shall provide a method for staff to privately report sexual abuse and sexual harassment of IICs. Interviews with thirteen staff indicated that eleven were aware that they could privately report sexual abuse of an IIC. Most staff stated they could report through the hotline, to any member of the management team and through an incident report.

Based on a review of the PAQ, PREA Manual, memo related to John Howard Association, TRUST Act memo, the Handbook, the PREA Poster, observations during the tour, information from interviews with the PCM, random IICs and random staff, and the documentation provided related to the auditors test of the outside entity reporting and the internal reporting line, this standard appears to require corrective action. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only posted information on the outside reporting entity. Interviews with 26 IICs indicated twelve were aware of an outside reporting entity and eleven were aware they could anonymously report.

	<p>Corrective Action</p> <p>The facility will need to ensure IIC are aware of JHA information and that all housing units have the necessary information posted via the PREA Reporting Poster. The facility will need to provide photos of the PREA Reporting Poster in each housing unit.</p> <p>Verification of Corrective Action Since the Interim Audit Report</p> <p>The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.</p> <p>Additional Documents:</p> <ol style="list-style-type: none"> <li>1. Updated PREA Reporting Poster</li> <li>2. Photos of PREA Reporting Posted Around Facility</li> </ol> <p>The facility provided the updated PREA Reporting Poster which included information on reporting to JHA via mail. The facility provided 30 photos of the PREA Reporting Poster around the facility, including in housing units.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.114 Local Offender Grievance Procedures</li> </ol>

3. Individuals In Custody Orientation Manual (Handbook)
4. Grievance Log
5. Sexual Abuse Grievances

Interviews:

1. Interviews with Individuals In Custody who Reported Sexual Abuse

Findings (By Provision):

115.52 (a): 04.01.114 is the policy related to grievance procedures for IICs. The PAQ indicated that the agency is not exempt from this standard.

115.52 (b): The PAQ indicated that agency policy or procedure allows an IIC to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. The PAQ further indicated that IICs are required to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse. Further communication with the PC indicated that this was an error and that IIC are not required to use the informal grievance process. 04.01.114, page 2 states that offender grievances related to allegations of sexual abuse shall not be subject to any filing time frame. Policy further states that offender grievances involving alleged incidents of sexual abuse shall be exempt from any informal grievance process. A review of Handbook confirmed that information on grievances is provided to IICs on pages 24-25.

115.52 (c): The PAQ stated that agency policy and procedure allow an IIC to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. It further stated that agency policy and procedure requires that an IIC grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint. 04.01.114, page 6 indicates an offender may submit the grievance without submitting it to any staff member who is the subject of the complaint. Policy further states that no grievance shall be referred to any staff member who is the subject of the complaint. A review of Handbook confirmed that information on grievances is provided to IICs on pages 24-25.

115.52 (d): The PAQ stated that agency policy and procedure requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be

made within 90 days of the filing of the grievance. The PAQ indicated that there were four sexual abuse grievances filed in the previous twelve months. The PAQ stated all four had a final decision reached within 90 days. The updated PAQ indicated there have been 25 sexual abuse grievances filed in the previous twelve months and 24 had a response within 90 days. The PAQ further indicates that the agency always notifies an IIC in writing when the agency files for an extension, including notice of the date by which a decision will be made. 04.01.114, page 6 states that the Department shall issue a final 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 shall not include time consumed by the offender in preparing any administrative appeal. Policy further states that the Department may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The offender shall be notified, in writing, of such extension and provided with a date by which a decision will be made. Page 6 also states that at any level of the grievance process, if the offender does not receive a response within the time allotted for reply, including any properly noticed extension, the offender may consider the absence of a response to be a denial at that level. A review of 25 grievances indicated while they all mentioned PREA, only one was sexual abuse. The allegation was forwarded to Internal Affairs for investigation. Further two allegations were retaliation and both were forwarded for investigation. All 25 grievances had a response within 90 days. The auditor also reviewed the grievance log and confirmed there were no other reports of sexual abuse. Interviews with IICs who reported sexual abuse indicated one knew he was to be notified of the outcome of the investigation. All three stated they were notified in writing a month or two after the reported allegation. None of the IICs indicated they reported their allegation via a grievance.

115.52 (e): The PAQ indicated that agency policy and procedure permits third parties, including fellow IICs, staff members, family members, attorneys, and outside advocates, to assist IICs in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of IICs. The PAQ further indicated that agency policy and procedure requires that if an IIC declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the IIC's decision to decline. 04.01.114, page 6 states that third parties, including other offenders, staff members, family members, attorneys, etc., shall be permitted to assist offenders in filing grievances relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of the offender. Policy further states that the Department shall require, as a condition of processing the grievance, the alleged victim to agree to have the grievance filed on his or her behalf. If the alleged victim declines, the decision shall be documented. The PAQ stated that there were zero grievances alleging sexual abuse by IICs in the past twelve months in which the IIC declined third-party assistance and which contained documentation of the IIC's decision to decline. A review of the 25 grievances and the grievance log indicated one was filed by a third party (other IIC), but it was not a report of sexual abuse.

115.52 (f): The PAQ indicated that the agency has a policy and established procedures for filing an emergency grievance alleging that an IIC is subject to a substantial risk of imminent sexual abuse. It further indicated that the agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The PAQ also indicated that the agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within five days. 04.01.114, page 7 states that for emergency grievances alleging an offender is subject to a substantial risk of imminent sexual abuse, the Department shall provide an initial response within 48 hours, and shall have a final decision provided within five calendar days. The initial response and the final decision shall document the Department's determination whether the offender is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance. The PAQ stated there were zero emergency grievance alleging substantial risk of imminent sexual abuse in the previous twelve months. The updated PAQ indicated there were 25 emergency grievances filed in the previous twelve months. A review of the 25 grievances indicated the facility deemed them all emergency, but none were true emergency grievances. Due to them not being an emergency all were answered under the regular grievance process and timelines.

115.52 (g): The PAQ indicated that the agency has a written policy that limits its ability to discipline an IIC for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the IIC filed the grievance in bad faith. 04.01.114, page 2 stats that staff shall be prohibited from imposing discipline due to use of the grievance process. The PAQ indicated that zero IICs have been disciplined for filing a grievance in bad faith in the previous twelve months.

Based on a review of the PAQ, 04.01.114, the Handbook, the grievance log and the sexual abuse grievances indicates that this standard appears to be compliant.

115.53	Inmate access to outside confidential support services
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention</li> </ol>



and Intervention Program

3. Memorandum of Understanding with Survivor Services Department Family Resources
4. Individuals in Custody Orientation Manual (Handbook)
5. PREA Posters
6. PREA Reporting Poster

Interviews:

1. Interviews with Random Individuals In Custody
2. Interviews with Individuals In Custody who Reported Sexual Abuse

Site Review Observations:

1. Observation of Victim Advocacy Information

Findings (By Provision):

115.53 (a): The PAQ indicated that the facility provides IICs with access to outside victim advocates for emotional support services related to sexual abuse. It further stated that the facility provides IICs with access to such services by giving IICs mailing addresses and telephone numbers for local, state or national victim advocacy or rape crisis organizations and that the facility provides IICs with access to such services by enabling reasonable communication between IICs and these organizations in a confidential a manner as possible. The PAQ stated that IDOC does not hold individuals strictly for immigration purposes. 04.01.301, page 5 states that the PCM shall identify community agencies, including advocacy and crisis organizations, where reports can be made or that provide assistance or support services to staff or offenders in the prevention or intervention of sexual abuse and harassment. Contact information such as mailing addresses shall be provided via offender handbook, bulletins, etc. The MOU with Survivor Services Department Family Resources indicates that the purpose and scope of the MOU is to establish a joint effort between IDOC and Survivor Services Department Family Resources to make available to IICs access to an outside entity to provide emotional support services related to sexual abuse, including crisis intervention and sexual assault counseling, to aid IDOC in fulfilling compliance with 115.53 while IICs are incarcerated at East Moline Correctional Center and within the IDOC prison. The MOU further states that it understood face-to-face emotional support provided in a confidential a manner as possible or emotional

support through confidential unmonitored, unrecorded phone call(s) shall comply with 735 ILCS 5/8-802.1 "Confidentiality of Statements Made to Rape Crisis Personnel". A review of the Handbook and PREA Poster confirmed that IICs are provided the mailing address and telephone number to Survivor Services Department Family Resources.. The documents state that individuals in custody may contact victim advocates for emotional support services related to sexual abuse. The PREA Poster (which is included in the Handbook) states that advocacy can be provide either by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only poster with information on the outside reporting entity and the contact information for the victim advocacy service. During the tour the auditor observed that IICs are able to place outgoing mail in any of the locked boxes around the facility, including in the housing units. None of the drop boxes were specific to sexual abuse or sexual harassment allegations or information. The interview with the mailroom staff indicated that outgoing mail that is regular mail comes to them unsealed. The mail is read and inspected for contraband and is then sealed and sent out. Legal mail comes sealed and is not read or inspected. The mailroom staff stated that the incoming mail process starts with separating and prioritizing (i.e. legal or regular). Regular mail is opened by staff who go through it, scan it and ensure it does not contain any contraband. IICs are then given the original documents. Legal mail is not opened by staff and is sent into the facility for a Sergeant to deliver to the IIC. The IIC opens the legal mail in the presence of staff. The mailroom staff mail to and from the local rape crisis center is also treated like legal/privileged mail. The auditor was unable to test access to victim advocacy services during the on-site portion of the audit. IICs can add the victim advocacy number to their call list and call through the IIC phones, which are monitored or recorded, or they can set up a legal call or visit with the organization through medical, mental health or their counselor. The IIC would request the confidential call and the staff member would set up the call. The advocate would call the facility and the call would be transferred to the legal call area. While this is a more confidential method for speaking to the victim advocate than in the housing unit with numerous other IICs surrounding them, the process is not known by staff or IIC. During the on-site portion of the audit the auditor attempted to contact the number provided via a staff phone and found the number was not functional. The auditor then called another number that the facility advised was associated with the organization and left a message, however the auditor did not receive a call back

related to the voicemail. Additionally, the auditor emailed the organization and the email was returned undeliverable. Interviews with 26 IICs, including those who reported sexual abuse, indicated eight were aware of outside victim advocacy services and seven were provided a phone number and mailing address to a local rape crisis center. Those that stated they were provided the contact information stated they did not know any specifics but the information was in the Handbook and/or on the wall.

115.53 (b): The PAQ indicated that the facility informs IICs, prior to giving them access to outside support services, the extent to which such communications will be monitored. It further stated that the facility informs IICs, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law. The MOU with Survivor Services Department Family Resources indicates that the purpose and scope of the MOU is to establish a joint effort between IDOC and Survivor Services Department Family Resources to make available to IICs access to an outside entity to provide emotional support services related to sexual abuse, including crisis intervention and sexual assault counseling, to aid IDOC in fulfilling compliance with 115.53 while IICs are incarcerated at East Moline Correctional Center and within the IDOC prison. The MOU further states that it understood face-to-face emotional support provided in a confidential a manner as possible or emotional support through confidential unmonitored, unrecorded phone call(s) shall comply with 735 ILCS 5/8-802.1 "Confidentiality of Statements Made to Rape Crisis Personnel". A review of the Handbook and PREA Poster confirmed that IICs are provided the mailing address and telephone number to Call for Help. The documents state that individuals in custody may contact victim advocates for emotional support services related to sexual abuse. The PREA Poster (which is included in the Handbook) states that advocacy can be provide either by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. Pages 25 of the Handbook outlines the mail process and page 26 outlines the telephone process, including information about telephone calls from individual in custody phones being subject to monitoring and recording. During the tour the auditor observed PREA information posted throughout the facility. Housing units had the oversized poster (PREA Poster). Some housing units also had the regular paper size posters (PREA Reporting Poster). The PREA Reporting Posters were observed on bright colored letter size paper in English and Spanish. The PREA Posters were observed on larger colored paper in both English and Spanish. In addition to the posters the auditor observed numerous print outs on letter size paper that included an array of PREA information. Most of these were observed in common areas, such as the chapel, education and vocation The PREA Reporting Poster also included contact information for outside victim advocacy services. The PREA Reporting Poster indicated that victim advocacy can be provided by phone or in-person and will be provided in as confidential a manner as possible consistent with legal calls/visits. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters,

which is the only poster with information on the outside reporting entity and the contact information for the victim advocacy service. During the tour the auditor observed that IICs are able to place outgoing mail in any of the locked boxes around the facility, including in the housing units. None of the drop boxes were specific to sexual abuse or sexual harassment allegations or information. The interview with the mailroom staff indicated that outgoing mail that is regular mail comes to them unsealed. The mail is read and inspected for contraband and is then sealed and sent out. Legal mail comes sealed and is not read or inspected. The mailroom staff stated that the incoming mail process starts with separating and prioritizing (i.e. legal or regular). Regular mail is opened by staff who go through it, scan it and ensure it does not contain any contraband. IICs are then given the original documents. Legal mail is not opened by staff and is sent into the facility for a Sergeant to deliver to the IIC. The IIC opens the legal mail in the presence of staff. The mailroom staff mail to and from the local rape crisis center is also treated like legal/privileged mail. Interviews with 26 IICs, including those who reported sexual abuse, indicated eight were aware of outside victim advocacy services and seven were provided a phone number and mailing address to a local rape crisis center. Those that stated they were provided the contact information stated they did not know any specifics but the information was in the Handbook and/or on the wall.

115.53 (c): The PAQ indicated that the facility maintains a memorandum of understanding or other agreement with a community service provider that is able to provide IICs with emotional support services related to sexual abuse. The PAQ also indicated that the facility maintains copies of the agreement. A review of documentation confirms that the facility has an MOU with Survivor Services Department Family Resources. The MOU was signed September 10, 2021 and the facility maintains a copy of the MOU.

Based on a review of the PAQ, 04.01.301, the MOU with Survivor Services Department Family Resources, the IIC Handbook, the PREA Poster and interviews with random IICs and IICs who reported sexual abuse this standard appears to require corrective action. While the facility had PREA information posted, not all housing units had the PREA Reporting Posters, which is the only posted information with the contact information for the victim advocacy service. The auditor was unable to test access to victim advocacy services during the on-site portion of the audit. IICs can add the victim advocacy number to their call list and call through the IIC phones, which are monitored or recorded, or they can set up a legal call or visit with the organization through medical, mental health or their counselor. The IIC would request the confidential call and the staff member would set up the call. The advocate would call the facility and the call would be transferred to the legal call area. While this is a more confidential method for speaking to the victim advocate than in the housing unit with numerous other IICs surrounding them, the process is not known by staff or IIC. During the on-site portion of the audit the auditor attempted to contact the number provided via a staff phone and found the number was not functional. The

auditor then called another number that the facility advised was associated with the organization and left a message, however the auditor did not receive a call back related to the voicemail. Additionally, the auditor emailed the organization and the email was returned undeliverable. Interviews with 26 IICs, including those who reported sexual abuse, indicated eight were aware of outside victim advocacy services and seven were provided a phone number and mailing address to a local rape crisis center.

#### Corrective Action

The facility will need to communicate with the local rape crisis center to determine appropriate contact information for facility staff and IICs. The facility will need to update all current information with adequate contact number, including the Handbook and the PREA Reporting Posters. A copy of the updated information will need to be provided as well as photos of the posted updated information around the facility (including in each housing unit). The facility will need to educate all appropriate staff on the current process for contacting the victim advocate for IICs who request the call. A copy of the training will need to be provided. The facility will need to test this mechanism to ensure functionality and provide confirmation.

#### Recommendation

The auditor highly recommends that the facility allow IICs to contact the local rape crisis center through the IIC phone system via a free private call.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Communication with Rape Crisis Center
2. Updated PREA Reporting Poster
3. Updated Individual In Custody Orientation Manual (Handbook)

	<p>4. Photos of Updated PREA Reporting Poster Around Facility</p> <p>The facility provided communication they had with the rape crisis center as well as updated contact information. The auditor contacted the rape crisis center in April.</p> <p>The agency implemented a speed dial for the local rape crisis center during the corrective action period. All IICs are able to contact the rape crisis center from the IIC phones via a 999 speed dial. The facility updated the Handbook and PREA Reporting Poster to include the 999 hotline as well as the mailing address for the rape crisis center. Further, the documents included information on confidentiality of the communication, including that calls to the hotline are not monitored or recorded.</p> <p>30 photos were provided of the updated PREA Reporting Poster around the facility, including in each housing unit.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.54</b>	<b>Third-party reporting</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>3. PREA Posters</li> </ol> <p>Findings (By Provision):</p> <p>115.54 (a): The PAQ indicated that the agency has a method to receive third-party reports of sexual abuse and sexual harassment and the agency publicly distributes that information on how to report sexual abuse and sexual harassment on behalf of</p>

an IIC. The PREA Manual, page 32 states that the Department shall post publicly, and maintain, the third-party reporting avenue on its public website. A review of the agency's website confirms that there is information on how to report sexual abuse and/or staff sexual misconduct. Individuals can call the IDOC Headquarters number (217-558-4013) and leave a message. Additionally, the PREA Posters state that individuals can write to the IDOC PREA Coordinator and/or to the John Howard Association. During the tour third party reporting information was observed in the visitation area and the front entrance. Both areas contained the End the Silence Poster and the Reporting Poster, both of which had information on reporting via the PREA Hotline and staff and one that advised to report via the PREA Coordinator or John Howard Association. Posters were observed in English and Spanish. One Poster was on bright pink paper and the other had bright colors. Posters were observed in typical paper size and font. The auditor tested the third party reporting mechanism on January 22, 2023. The auditor called the PREA hotline as outlined on the agency website. The hotline is the same hotline utilized for the IIC population. The auditor received confirmation from the PREA Coordinator on January 23, 2023 that the message was received and forwarded to him to handle. He indicated he would provide the information to the facility for investigation if it was a report of sexual abuse or sexual harassment. During the tour third party reporting information was observed in visitation via the PREA Poster. The PREA Poster was observed in English and Spanish on legal size paper. The facility does not have a front entrance and IICs and the public do not have access to the administration area.

Based on a review of the PAQ, the PREA Manual, the PREA Posters and the agency's website this standard appears to be compliant.

115.61	Staff and agency reporting duties
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 01.12.105 Reporting of Unusual Incidents</li> <li>4. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>5. Investigative Reports</li> </ol>

Interviews:

1. Interviews with Random Staff
2. Interviews with Medical and Mental Health Staff
3. Interview with the Warden
4. Interview with the PREA Coordinator

Findings (By Provision):

115.61 (a): The PAQ indicated that the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; any retaliation against IICs or staff who reported such an incident; and/or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. 04.01.301, page 8 states that any verbal report or observance of sexual activity shall be treated as possible sexual abuse. Any report or observance of sexual abuse or harassment shall be documented on an Incident Report, DOC 0434, and reported to the facility PCM in accordance with Paragraph II.G.6. All reports shall be investigated accordingly. Page 10 (Paragraph II.G.6) states that any alleged sexual abuse or harassment shall be reported through chain of command as an unusual incident in accordance with 01.12.105. All staff who observe the alleged abuse or harassment or to whom the initial report was made shall complete a DOC 0434 and may be required to be interviewed by an investigator or other staff designated by the Chief Administrative Officer prior to leaving the facility at the end of their shift. Interviews with thirteen staff confirmed that policy requires that they report any knowledge, suspicion or information regarding an incident of sexual abuse and sexual harassment, any retaliation related to reporting sexual abuse and/or information related to any staff neglect or violation of responsibilities that contributed to the sexual abuse or retaliation. Staff stated they would report the information to their supervisor, the Warden and/or Internal Affairs.

115.61 (b): The PAQ indicated that apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. 04.01.301, page 8 states that any verbal report or observance of sexual activity shall be treated as possible sexual abuse. Any report or observance of sexual abuse or harassment shall be documented on an Incident Report, DOC 0434, and reported to the facility PCM in accordance with Paragraph



II.G.6. All reports shall be investigated accordingly. Page 10 (Paragraph II.G.6) states that any alleged sexual abuse or harassment shall be reported through chain of command as an unusual incident in accordance with 01.12.105. All staff who observe the alleged abuse or harassment or to whom the initial report was made shall complete a DOC 0434 and may be required to be interviewed by an investigator or other staff designated by the Chief Administrative Officer prior to leaving the facility at the end of their shift. The PREA Manual, page 32 further states that the information concerning the identity of the alleged offender victim and the specific facts of the case shall be limited to staff who need to know because of their involvement with the victim's welfare and the investigation of the incident. This is important to not only preserve the victim's privacy but to preserve maximum flexibility to investigate the allegation. Interviews with thirteen staff confirmed that policy requires that they report any knowledge, suspicion or information regarding an incident of sexual abuse and sexual harassment, any retaliation related to reporting sexual abuse and/or information related to any staff neglect or violation of responsibilities that contributed to the sexual abuse or retaliation. Staff stated they would report the information to their supervisor, the Warden and/or Internal Affairs.

115.61 (c): Interviews with medical and mental health care staff confirm that at the initiation of services with an IIC they disclose limitations of confidentiality and their duty to report. Both staff stated they are required to report any knowledge, suspicion or information related an incident of sexual abuse or sexual harassment. One of the two staff members stated that she had been informed of an allegation of sexual abuse and immediately reported it to security. A review of eight allegations indicated one was reported to a mental health care staff member. The staff reported the information to security and completed a written report as well.

115.61 (d): The interview with the PREA Coordinator indicated that while State law (730 ILCS 5/5-8-6) specifically prohibits anyone under the age of eighteen to be confined to the Illinois Department of Corrections; if an allegation was made regarding a youth (such as a minor child visiting an individual in custody housed at the facility), the Illinois State Police and/or the Department of Children & Family Services, as appropriate, would be contacted to notify the agency of the allegation so they may properly investigate. For allegations made by a vulnerable adult in custody, the agency would ensure access to mental health is available for immediate assessment (per our PREA protocol) as well as long-term services. Additionally, access to community confidential support services would be available and offered. The interview with the Warden indicated they would open an investigation and have the individual seen by medical and mental health. The interview indicated the Warden was unfamiliar of mandatory reporting laws.

115.61 (e): 04.01.301, page 8 states that any verbal report or observance of sexual activity shall be treated as possible sexual abuse. Any report or observance of sexual

abuse or harassment shall be documented on an Incident Report, DOC 0434, and reported to the facility PCM in accordance with Paragraph II.G.6. All reports shall be investigated accordingly. Page 10 (Paragraph II.G.6) states that any alleged sexual abuse or harassment shall be reported through chain of command as an unusual incident in accordance with 01.12.105. All staff who observe the alleged abuse or harassment or to whom the initial report was made shall complete a DOC 0434 and may be required to be interviewed by an investigator or other staff designated by the Chief Administrative Officer prior to leaving the facility at the end of their shift. The interview with the Warden confirmed that all allegations are reported to designated facility investigators. A review of investigations indicated four were reported verbally and three were reported via the hotline. All seven included incident reports from staff involved to ensure the information was documented and referred for investigation.

Based on a review of the PAQ, 04.01.301, 01.12.105, the PREA Manual, investigative reports and information from interviews with random staff, medical and mental health care staff, the PREA Coordinator and the Warden indicates that this standard appears to require corrective action. The interview with the Warden indicated they would open an investigation and have the individual seen by medical and mental health. The interview indicated the Warden was unfamiliar of mandatory reporting laws.

#### Corrective Action

The facility will need to review mandatory reporting laws with applicable administrative staff. A copy of the training will need to be provided.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training

The facility provided staff training that was completed related to mandatory reporting laws in the State of Illinois. Staff signatures were provided confirming receipt and

	<p>understanding of the training.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>4. Investigative Reports</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency Head</li> <li>2. Interview with the Warden</li> <li>3. Interviews with Random Staff</li> </ol> <p>Findings (By Provision):</p> <p>115.62 (a): The PAQ indicated that when the agency or facility learns that an IIC is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the IIC (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay). 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be immediately provided protection from the alleged abuser and the incident shall be investigated. The PREA Manual, page 33 states that in cases where the alleged perpetrator is another offender, the Shift Supervisor shall be notified immediately. The Shift Supervisor shall ensure appropriate and immediate safeguards to protect the offender are taken.</p>

	<p>Depending on the severity, safeguards may include monitoring the situation, changing housing assignments, changing work assignments, placing the alleged victim and perpetrator in Special Housing, etc. The PREA Manual further states that if the alleged perpetrator is a staff member, all options for safeguarding the offender shall be considered as described above. Options may include reassignment to another unit or post, or other measures that will effectively separate the staff member from the offender. The original and updated PAQ stated that there were zero determinations made in the past twelve months that an IIC was at substantial risk of imminent sexual abuse. The Agency Head stated that the agency has many actions, including removing the individual from harm's way, removing the perpetrator and placing the staff member on administrative leave. He further stated that the risk would be investigated and the individual would be provided medical and mental health services. The interview with the Warden indicated if an IIC was deemed at imminent risk of sexual abuse they may be labeled vulnerable and this would be used to house them appropriately. He stated they would monitor that individual and keep them in housing located in the administration building. He stated they would also ensure they have contact with mental health to monitor any issues. Interviews with random staff indicated if they determined an IIC was at imminent risk they would separate the individual from the harm, notify their supervisor and move them to another housing area or to a safe place. A review of incident reports indicated there were two IICs who reported sexual abuse. Neither were at imminent risk of sexual abuse, however in both instances the staff changed housing of one of the IICs as a protective measure. Both IICs were seen by mental health and an investigation was completed.</p> <p>Based on a review of the PAQ, 04.01.301, PREA Manual and information from interviews with the Agency Head, Warden and random staff indicates that this standard appears to be compliant.</p>
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<b>115.63 Reporting to other confinement facilities</b>	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> </ol>

#### 4. Investigative Reports

##### Interviews:

1. Interview with the Agency Head
2. Interview with the Warden

##### Findings (By Provision):

115.63 (a): The PAQ indicated that the agency has a policy requiring that, upon receiving an allegation that an IIC was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. 04.01.301, page 9 states that reports of sexual abuse or sexual harassment occurring while an offender was housed within a different jurisdiction, such as a municipal lockup, county jail, or correctional center in another state, shall be documented on a DOC 0434 and reported to the Chief Administrative Officer of the facility that received the allegation the allegation to the Chief Administrative Officer of the agency where the alleged abuse occurred within 72 hours. The PAQ stated there was one allegation received that an IIC was abused while confined at another facility. The PAQ indicated the response to the allegation included offering the victim access to medical, mental health and outside support services. The updated PAQ stated during the previous twelve months there were zero allegations received that an IIC was abused while confined at another facility. The auditor requested documentation for the one Warden to Warden notification on the original PAQ, however at the issuance of the interim report the documentation was not received.

115.63 (b): The PAQ indicated that agency policy requires that the facility head provide such notification as soon as possible, but no later than 72 hours after receiving the allegation. 04.01.301, page 9 states that reports of sexual abuse or sexual harassment occurring while an offender was housed within a different jurisdiction, such as a municipal lockup, county jail, or correctional center in another state, shall be documented on a DOC 0434 and reported to the Chief Administrative Officer of the facility that received the allegation the allegation to the Chief Administrative Officer of the agency where the alleged abuse occurred within 72 hours. The auditor requested documentation for the one Warden to Warden notification on the original PAQ, however at the issuance of the interim report the documentation was not received.

115.63 (c): The PAQ indicated that the agency or facility documents that it has provided such notification within 72 hours of receiving the allegation. 04.01.301, page 9 states that reports of sexual abuse or sexual harassment occurring while an offender was housed within a different jurisdiction, such as a municipal lockup, county jail, or correctional center in another state, shall be documented on a DOC 0434 and reported to the Chief Administrative Officer of the facility that received the allegation the allegation to the Chief Administrative Officer of the agency where the alleged abuse occurred within 72 hours. The auditor requested documentation for the one Warden to Warden notification on the original PAQ, however at the issuance of the interim report the documentation was not received.

115.63 (d): The PAQ indicated that the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. 04.01.301, page 9 states reports of sexual abuse or harassment occurring while an individual in custody was housed at a different facility shall be reported to the CAO of the facility where the incident occurred as soon as possible, but not later than 72 hours after the initial report was received. The CAO that receives such notification shall ensure the allegation is investigated in accordance with the procedures herein. The PREA Manual, pages 33-34 state that in cases where there is an allegation that sexual abuse occurred at another Department facility, the Chief Administrative Officer of the victim's current facility shall report the allegation to the Chief Administrative of the identified facility. In cases alleging sexual abuse by staff at another facility, the Chief Administrative Officer of the offender's current facility shall refer the matter directly to Internal Affairs. The PAQ stated there were zero allegations reported to the facility from another facility in the previous twelve months. The updated PAQ stated there was one allegation received from another agency/facility during the previous twelve months. A review of seven allegations reported during the previous twelve months indicated all were reported to the facility, either via the hotline or verbally to staff. The auditor requested documentation related to the one allegation indicated in the updated PAQ, however at the issuance of the interim report the documentation had not yet been received. The Agency Head stated that when notified by another agency of an allegation within an IDOC facility, the point of contact is the PC. He stated the PC would then forward it to the appropriate facility to investigate. The Agency Head indicated that the agency/facility would reach out to the other agency to obtain any follow-up information. He confirmed that they had a recent example from South Dakota and that it was forwarded from the PC to the facility for investigation. The interview with the Warden indicated that if they received an allegation from another agency/facility they would follow-up and complete an investigation. He stated he believed they had an example about a year ago where an IIC reported he was sexually abused at the facility. The IIC was on parole and the facility investigator worked with individuals to complete the investigation.

Based on a review of the PAQ, 04.01.301, the PREA Manual, investigative reports and

interviews with the Agency Head and Warden, this standard appears to require corrective action. The auditor requested documentation for the one Warden to Warden notification on the original PAQ, however at the issuance of the interim report the documentation was not received. A review of seven allegations reported during the previous twelve months indicated all were reported to the facility, either via the hotline or verbally to staff. The auditor requested documentation related to the one allegation indicated in the updated PAQ, however at the issuance of the interim report the documentation had not yet been received.

#### Corrective Action

The facility will need to provide the requested documentation.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

##### 1. Clarification Documentation

Documentation was provided that indicated there were no IICs who reported sexual abuse to the facility that occurred at another facility. Further, the documentation confirmed there were zero allegations provided to the facility from another agency/ facility. The documentation outlined that the one Warden to Warden notification noted in the PAQ was actually notification from another facility to East Moline related to the need to continue monitoring a sexual abuse victim as he was transferring to East Moline. As such, there were not Warden to Warden notifications sent or received during the twelve months prior to the on-site portion of the audit.

Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. PREA Checklist
4. Investigative Reports

Interviews:

1. Interview with First Responders
2. Interviews with Random Staff
3. Interviews with Individuals In Custody who Reported Sexual Abuse

Findings (By Provision):

115.64 (a): The PAQ indicated that the agency has a first responder policy for allegations of sexual abuse and that the policy requires that, upon learning of an allegation that an IIC was sexually abused, the first security staff member to respond to the report to separate the alleged victim and abuser. It further states that the policy requires that, upon learning of an allegation that an IIC was sexually abused, the first security staff member to respond to the report to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence and if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report request that the alleged victim and ensure that the alleged perpetrator not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be immediately provided protection from the alleged abuser and the incident shall be investigated. The victim shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5 and be evaluated by mental health or a crisis intervention team member within 24 hours to assess the need for counseling services. Policy further states that staff responding to any allegation of sexual abuse shall take steps to ensure preservation of the area in which the alleged abuse occurred, including requesting the alleged victim and abuser



not to take any action that. may destroy physical evidence, including changing clothes, bathing, brushing teeth, urinating, defecating drinking or eating, etc. The PREA Checklist also provides staff with a checklist of duties to ensure is completed post sexual abuse allegation. The PREA Checklist includes the required first responder duties. The PAQ stated there were four allegations of sexual abuse in the previous twelve months and all four involved the immediate separation of the alleged victim and abuser. None of the allegations involved the collection of physical evidence by securing of the crime scene and none included requesting the victim and ensuring the abuser not take any action to destroy any evidence. The updated PAQ indicated there was one allegation that involved the separation of the alleged victim and abuser. A review of seven investigations indicated three were sexual abuse. None of the three involved any first responder duties. The interview with the security first responder indicated duties after a report of sexual abuse include; separating the two individuals, making sure they do not shower or take action to destroy evidence, preserve evidence where it happened (secure scene) and notify medical and the chain of command. The non-security first responder stated non-security first responder duties include reporting it to the supervisor and making sure the individual is safe. Interviews with IICs who reported sexual abuse indicated two reported verbally to staff. Both indicated they were interviewed by IA and they stayed in the same housing unit. The third IIC stated he reported the allegation via the hotline. He stated he spoke to IA and stayed in the same housing unit.

115.64 (b): The PAQ indicated that agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence. It further indicated that agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to notify security staff. 04.01.301, page 8 states that a member of the security staff shall be promptly notified if the staff responding is other than security staff. The PREA Checklist also provides staff with a checklist of duties to ensure is completed post sexual abuse allegation. The PREA Checklist includes the required first responder duties. The PAQ stated there was one allegation of sexual abuse that involved a non-security staff first responder. The incident involved the non-security first responder notifying security staff but did not require requesting the victim not to take any action to destroy any evidence. The updated PAQ indicated there were zero allegations that involved non-security first responders. A review of seven investigations indicated one allegation was reported to a non-security first responder who reported the information to security. The allegation did not involve any other first responder duties. The interview with the security first responder indicated duties after a report of sexual abuse include; separating the two individuals, making sure they do not shower or take action to destroy evidence, preserve evidence where it happened (secure scene) and notify medical and the chain of command. The non-security first responder stated non-security first responder duties include reporting it to the supervisor and making sure the individual is safe. The interviews with thirteen random staff confirm that staff are aware of first responder duties.

	<p>Based on a review of the PAQ, 04.01.301, investigative reports, the PREA Checklist and interviews with random staff and first responders, this standard appears to be compliant.</p>
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<b>115.65</b>	<b>Coordinated response</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. East Moline Correctional Center Institutional Directive (ID) 04.01.301 Sexual Abuse and Harassment Prevention and Intervention</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Warden</li> </ol> <p>Findings (By Provision):</p> <p>115.65 (a): The PAQ indicated that the facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. ID 04.01.301, page 7 states that any offender who alleges to be a victim of sexual abuse shall be immediately provided protection from the alleged abuser and the incident shall be investigated. The victim shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5. The decision to collect evidence shall be made on a case-by-case basis in accordance with standard investigative procedures. The victim will be evaluated by mental health or a crisis intervention team member within 24 hours to assess the need for counseling services. Policy further states that staff responding to any allegation of sexual abuse shall take steps to ensure preservation of the area in which the alleged abuse occurred, including requesting the alleged victim and abuser not to take any action that may destroy physical evidence, including changing clothes, bathing, brushing teeth, urinating, defecating drinking or eating, etc. Pages</p>

	<p>9-10 describe medical and mental health treatment for victims of sexual abuse, pages 11-12 describes the investigative process for allegations of sexual abuse and pages 3-7 describe the facility leaderships responsibilities. The Warden confirmed that the facility has an institutional plan that coordinates actions among staff first responders, medical and mental health practitioners, investigators and facility leadership. He stated there is a checklist that goes over who to contact and what steps to take after a report of sexual abuse or sexual harassment.</p> <p>Based on a review of the PAQ, ID 04.01.301 and information from the interview with the Warden, this standard appears to be compliant.</p>
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<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Collective Bargaining Agreements</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency Head</li> </ol> <p>Findings (By Provision):</p> <p>115.66 (a): The PAQ indicated that the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later. A review of a sample of the agency's collective bargaining agreements confirm that those reviewed allowed for the removal of the alleged staff abuser. Most of the agreements indicated that a written reason for the removal, discipline or termination should be provided to the union. The interview with the Agency Head confirmed that the agency has entered into or renewed any collective bargaining agreements or other agreements since August 20, 2012. He stated that depending on the severity, the agreements allow</p>

	<p>staff to be removed from contact and/or placed on administrative leave.</p> <p>115.66 (b): The auditor is not required to audit this provision.</p> <p>Based on a review of the PAQ, a sample of collective bargaining agreements and the interview with the Agency Head, this standard appears to be compliant.</p>
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<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Retaliation Monitor – Staff (DOC 0499)</li> <li>4. PREA Retaliation Monitor – Offender (DOC 0498)</li> <li>5. Investigative Reports</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Agency Head</li> <li>2. Interview with the Warden</li> <li>3. Interview with Designated Staff Member Charged with Monitoring Retaliation</li> <li>4. Interviews with Individuals In Custody who Reported Sexual Abuse</li> </ol> <p>Findings (By Provision):</p> <p>115.67 (a): The PAQ indicated that the agency has a policy to protect all IICs and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other IICs or staff. 04.01.301,</p>

pages 11-12 state that for a minimum of 90 days following the initial report of sexual abuse or harassment, the Department shall monitor the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to observe if there are changes that may suggest possible retaliation by offenders or staff. Policy further states that the Department shall act promptly to remedy any such retaliation. The PAQ indicated that the agency designates staff members charged with monitoring for retaliation. At East Moline Correctional Center the position responsible for monitoring is the Assistant Warden of Operations and the Social Worker IV.

115.67 (b): 04.01.301, pages 11-12 state that for a minimum of 90 days following the initial report of sexual abuse or harassment, the Department shall monitor the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to observe if there are changes that may suggest possible retaliation by offenders or staff. Offender conduct and treatment shall be documented on the PREA Retaliation Monitor - Offender, DOC 0498. The review shall include, but not be limited to, disciplinary reports, housing or programming changes and facility transfers and include periodic status checks to ensure he or she displays no changes that may suggest retaliation. Staff conduct and treatment shall be documented on the PREA Retaliation Monitor - Staff, DOC 0499. The review shall include, but not be limited to, negative performance reviews and reassignments. A review of investigative reports and monitoring documents indicated that there were no reported allegations of retaliation nor any reported fear of retaliation. Interviews with the Agency Head, Warden and staff responsible for monitoring retaliation all indicated that protective measures would be taken if an IIC or staff member expressed fear of retaliation. The Agency Head stated that the agency has options to protect individual, including transferring an individual to another facility, removing the abuser from contact with the individual and moving staff to another post or facility. The Warden stated that for IIC-on-IIC they would separate the individuals and if it was serious they could transfer one of the individuals. He stated if it was staff-on-IIC they would separate them by not allowing staff to work on a specific unit. The interview with the staff who monitor for retaliation indicated that upon receipt of notification from IA, IICs are advised of the resources outside the facility and the staff gives them her name and information related to monitoring for retaliation. She stated she monitors every 30 days for 90 days. She indicated she would talk to IA about any concerns and she would make suggestions on housing changes, job changes, facility transfers and/or removal of staff abusers. She confirmed they also give the IICs a letter with emotional support service information. Interviews with three IICs who reported sexual abuse indicated all three felt safe at the facility. Two of the three stated they felt protected against retaliation. One IIC stated he did not feel protected because staff were unprofessional at the facility and they harass him and everyone else. There were no IICs in segregated housing for risk of victimization or for reporting sexual abuse and as such no interviews were conducted.

115.67 (c): The PAQ indicated that the agency/facility monitors the conduct or treatment of IICs or staff who reported sexual abuse and of IICs who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by IICs or staff. The PAQ stated that monitoring is completed for a minimum of 90 days. The PAQ further stated that the agency/facility acts promptly to remedy any relation and that the agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. 04.01.301, pages 11-12 state that for a minimum of 90 days following the initial report of sexual abuse or harassment, the Department shall monitor the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to observe if there are changes that may suggest possible retaliation by offenders or staff. Offender conduct and treatment shall be documented on the PREA Retaliation Monitor - Offender, DOC 0498. The review shall include, but not be limited to, disciplinary reports, housing or programming changes and facility transfers and include periodic status checks to ensure he or she displays no changes that may suggest retaliation. Policy further states that the Department shall act promptly to remedy any such retaliation. The PAQ noted there were zero incidents of retaliation reported in the previous twelve months. The interview with the Warden indicated that if retaliation is suspected or reported they would have it addressed by internal affairs through an investigation. The interview with the staff member responsible for monitoring retaliation indicated she conducts monitoring for 90 days and that if she suspects retaliation she would extend the period for another 90 days. She stated once the investigation is complete she reviews housing changes, grievances, job assignments and program assignments. She stated she does an overall review. A review of three sexual abuse investigative reports indicated all three required monitoring. Two of the three had monitoring for retaliation completed. Both were the full 90 days and included in person status checks and the required checks under this provision.

115.67 (d): 04.01.301, pages 11-12 state that for a minimum of 90 days following the initial report of sexual abuse or harassment, the Department shall monitor the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to observe if there are changes that may suggest possible retaliation by offenders or staff. Offender conduct and treatment shall be documented on the PREA Retaliation Monitor - Offender, DOC 0498. The review shall include, but not be limited to, disciplinary reports, housing or programming changes and facility transfers and include periodic status checks to ensure he or she displays no changes that may suggest retaliation. The staff member responsible for monitoring stated she conducts periodic status checks every 30 days for 90 days. A review of three sexual abuse investigative reports indicated all three required monitoring. Two of the three had monitoring for retaliation completed. Both were the full 90 days and included in person status checks.

115.67 (e): 04.01.301, page 12 states that if any other individual who cooperates

with an investigation expresses a fear of retaliation, the Department shall take appropriate measures to protect the individuals against retaliation. The Agency Head stated that the same protective measures would be offered to those who cooperate with an investigation or express fear for retaliation. The Warden stated that for IIC-on-IIC they would separate the individuals and if it was serious they could transfer one of the individuals. He stated if it was staff-on-IIC they would separate them by not allowing staff to work on a specific unit. The Warden indicated that if retaliation is suspected or reported they would have it addressed by internal affairs through an investigation.

115.67 (f): Auditor not required to audit this provision.

Based on a review of the PAQ, 04.01.301, investigative reports, DOC 0498 and interviews with the Agency Head, Warden and staff charged with monitoring for retaliation, this standard appears require corrective action. A review of three sexual abuse investigative reports indicated all three required monitoring. Two of the three had monitoring for retaliation completed. Additionally, while the staff who monitor for retaliation indicated the appropriate process, she inferred that monitoring did not start until the investigation was completed.

#### Corrective Action

The facility will need to train appropriate staff on the process for monitoring, including that it is to be initiated upon receipt of an allegation of sexual abuse. A copy of the training will need to be provided. The facility will need to provide a list of sexual abuse allegations during the corrective action period and corresponding monitoring for retaliation.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training

	<ol style="list-style-type: none"> <li>2. List of Sexual Abuse Allegations During Corrective Action Period</li> <li>3. Monitoring for Retaliation</li> </ol> <p>The facility provided a training memo related to the monitoring for retaliation process, which included ensuring monitoring is initiated when the allegation is reported. Staff signatures were provided confirming they received and understood the training.</p> <p>A list of sexual abuse allegations reported during the corrective action period were provided as well as associated monitoring documents. One IIC was transferred within 30 days of the reported allegation, one had monitoring completed for 30 days and was deemed unfounded and the third had retaliation completed for 60 days and was still active.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 05.15.100 Restrictive Housing</li> <li>4. Individuals In Custody Victim Housing Assignments</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Warden</li> <li>2. Interview with Staff who Supervise Individuals In Custody in Segregated Housing</li> </ol>



Site Review Observations:

1. Observations of the Segregated Housing Unit

Findings (By Provision):

115.68 (a): The PAQ indicated that the agency has a policy prohibiting the placement of IICs who allege to have suffered sexual abuse 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. The PAQ further indicated that if an involuntary segregated housing assignment is made, the facility affords each such IIC a review every 30 days to determine whether there is a continuing need for separation from the general population. The PAQ noted there were zero IICs who alleged sexual abuse were involuntarily segregated for zero to 24 hours or longer than 30 day. 04.01.301, page 7 states that an offender identified as vulnerable shall not be housed in a segregated status for the sole purpose of providing protective custody unless no other means of separation can be arranged. The placement shall require the approval of the Deputy Director or Agency PREA Coordinator (no designee) and shall only continue until an alternative means of separation can be provided and such placement in segregation shall not ordinarily exceed a period of 30 days. Page 9 further states that any offender who alleges sexual abuse shall have their housing needs reviewed to determine appropriate placement. If the offender is transferred to another facility, the PCM of the sending facility shall promptly notify the PCM of the receiving facility of the alleged sexual abuse or harassment to ensure the offender receives proper follow-up services. Additionally, 05.15.100, page 6 states that a Restrictive Housing Review Committee (RHRC) shall be established at each facility with restrictive housing. The committee shall review the status of each individual in custody's placement into restrictive housing every seven days for the first 60 days and at least every 30 days thereafter, unless more frequently if clinically indicated. During the tour the auditor observed the segregated housing unit. The segregated housing unit was a two tiered area with a hearing room and a separate outdoor recreation area. The hearing room was also utilized for any indoor recreation. PREA Reporting Posters were observed in English and Spanish on the bulletin boards. IICs are provided out of cell time through recreation, showers and visitation. Showers are three days a week and recreation is offered two times a day. Phone access is provided once a week. Mail and grievances can be placed in a locked box when out of the cell or can be provided to staff. A review of housing documents for three IICs who reported sexual abuse indicated all three remained in their same housing unit. Additionally, a review of housing documentation for four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment indicated none were placed in involuntary segregated housing after the report. The interview with the Warden confirmed that agency policy prohibits placing IICs who report sexual abuse in involuntary segregated housing unless an assessment

of all available alternatives has been made and it is determined that there are no alternative means of separation from likely abusers. The Warden confirmed that IICs would only be placed in involuntary segregated housing until an alternative means of separation from likely abuser(s) could be arranged. He stated an IIC would not be involuntarily segregated for more than a day or two and they would conduct an emergency transfer if needed. The Warden confirmed they have not involuntarily segregated an IIC who reported sexual abuse during the previous twelve months. The interview with the staff who supervise IICs in segregated housing confirmed that IICs who report sexual abuse who are involuntarily segregated would have access to programs, privileges and work opportunities to the extent possible. The staff stated that they do not place IICs who report sexual abuse in involuntary segregated housing as they do not punish the individuals. He stated segregated housing would be utilized as a last resort and that they typically place the abuser or potential abuser in segregated housing instead. The staff further stated that if access was restricted they would document the restrictions on the activity sheet and via an incident report. The staff who supervises segregated housing confirmed that they do not place IIC who report sexual abuse in segregated housing and they if they did it would only be until they could find alternative housing. The staff stated they would typically find a different housing unit to utilize rather than segregated housing. The staff further stated while they would not place an IIC who reported sexual abuse in involuntary segregated housing but the maximum amount of time someone would be involuntarily segregated under a rare circumstance would be no more than six days (time it would take to transfer one of the IICs). The interview with the staff who supervise IICs in segregated housing confirmed that IICs would be reviewed at least every 30 days for their continued need for placement in involuntary segregated housing. Staff stated IICs are reviewed weekly in segregated housing. There were no IICs identified to be in segregated housing due to an allegation of sexual abuse and as such no interviews were conducted.

Based on a review of the PAQ, 04.01.301, 05.15.100, housing documentation for IICs who reported sexual abuse and the interview with the Warden and staff who supervise IICs in segregated housing, this standard appears to be compliant.

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents: <ul style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> </ul>

3. Administrative Directive 01.12.120 Investigations of Unusual Incidents
4. Administrative Directive 01.12.101 Employee Criminal Misconduct
5. Administrative Directive 01.12.112 Preservation of Physical Evidence
6. Administrative Directive 01.12.125 Uniform Investigative Reporting System
7. Administrative Directive 01.12.115 Institutional Investigative Assignment
8. Memorandum of Understanding with the Illinois State Police/Office of Executive Inspector General
9. Investigative Reports
10. Investigator Training Records

Interviews:

1. Interviews with Investigative Staff
2. Interview with the Warden
3. Interview with the PREA Coordinator
4. Interview with the PREA Compliance Manager
5. Interviews with Individuals In Custody who Reported Sexual Abuse

Findings (By Provision):

115.71 (a): The PAQ indicated that the agency/facility has a policy related to criminal and administrative agency investigations. 04.01.301, page 10 states that all allegations of sexual abuse or harassment shall be investigated by trained investigators in accordance with 01.12.120. The initial investigative report shall be provided to the Chief Administrative Officer within 24 hours of the onset of the investigation. Policy further states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. 01.12.120, page 1 states the CAO shall ensure that an internal investigation is conducted by facility staff, or by staff assigned by the Chief of Investigations and Intelligence, on each unusual incident reported, if it is determined that further facts are required. Page 2 states that the facility investigation shall include, but not be limited to: obtaining statements from all involved individuals; obtaining statements from all known and any possible witnesses; securing and preserving all weapons; securing and preserving any other evidence; determining if all policies and procedures were followed; determining the quality of

offender and staff supervision; conferring with local State Attorney to determine if criminal prosecution is warranted and referring individuals to the prosecuting authority for criminal prosecution, when warranted. 01.12.101, 01.12.105, 01.12.115, 01.12.112 and 01.12.125 all outline different elements to the investigative process for the agency. A review of the seven investigations, including those determined not to meet the definition of sexual abuse or sexual harassment, confirmed all seven had a completed administrative investigation. All seven investigations were prompt, thorough and objective. All seven included interviews with the alleged victim, suspect and witnesses, if applicable. Six of the seven investigations involved collecting evidence (video, phone calls, GTL messages, logs, etc.). Interviews with the facility investigators indicated that an investigation would be initiated as soon as possible or as soon as they are notified of the allegation. The criminal investigator stated that investigations are initiated immediately after the allegation is received. All three investigators confirmed that third party and anonymous reports are investigated the same as first person reports.

115.71 (b): 01.12.115, page 2 states that the CAO shall ensure that each individual appointed as an investigator be registered for the next available investigator training program within ten days of temporary or permanent assignment as an investigator. Training topics include but are not limited to: investigative techniques, including interviewing sexual abuse victims; crime scene preservation; collection and preservation of evidence, including sexual abuse evidence collection in a confinement setting; proper use of Miranda and Garrity warnings; criteria and evidence required to substantiate a case for administrative action or prosecution referral; and investigative reporting. The agency utilizes their own training for this standard; PREA for Investigators. A review of the training curriculum confirmed slides 67-118 include the following: techniques for interviewing 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 an administrative investigation. A review of documentation indicated that four facility/agency staff were documented with the specialized investigations training. A review of seven investigations revealed they were completed by two investigators, both of which had completed the specialized investigator training. The interviews with the investigators confirmed that the specialized investigator training included the topics required under this provision: techniques for interviewing 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 an administrative case.

115.71 (c): 04.01.301, page 10 states that for reports of sexual abuse, the crime scene shall always be protected and investigators shall collect and tag evidence from the scene in accordance with established procedures. Evidence collected shall be submitted to the State Police within ten business days of receipt. 01.12.120, page 1 states the CAO shall ensure that an internal investigation is conducted by facility staff, or by staff assigned by the Chief of Investigations and Intelligence, on each

unusual incident reported, if it is determined that further facts are required. Page 2 states that the facility investigation shall include, but not be limited to: obtaining statements from all involved individuals; obtaining statements from all known and any possible witnesses; securing and preserving all weapons; securing and preserving any other evidence; determining if all policies and procedures were followed; determining the quality of offender and staff supervision; conferring with local State Attorney to determine if criminal prosecution is warranted and referring individuals to the prosecuting authority for criminal prosecution, when warranted. 01.12.101, 01.12.105, 01.12.115, 01.12.112 and 01.12.125 all outline different elements to the investigative process for the agency. A review of the seven investigations, including those determined not to meet the definition of sexual abuse or sexual harassment, confirmed all seven had a completed administrative investigation. All seven investigations were prompt, thorough and objective. All seven included interviews with the alleged victim, suspect and witnesses, if applicable. Six of the seven investigations involved collecting evidence (video, phone calls, GTL messages, logs, etc.). None of the seven involved a review of prior complaints. The facility investigators stated that their first steps include ensuring appropriate first responder duties were taken such as separating the individuals, securing the scene and not allowing individuals to take any action to destroy evidence. The investigators further stated they would interview the alleged victim, interview any witnesses, interview the alleged perpetrator, review evidence and then build a report with appropriate findings. The facility investigators stated they would be responsible for collecting evidence such as DNA, physical, video, statements, mail, etc. The criminal investigator stated the initial investigative step would be to gather and preserve any evidence. He further stated he would remain objective during the investigation and base credibility on a case-by-case basis. He stated he would conduct a complete and thorough investigation. This is done through gathering and preserving direct and circumstantial evidence, including physical, DNA and any available video monitoring data. He confirmed he would interview the alleged victims, suspected perpetrators and any witnesses and he would review prior complaints and reports of sexual abuse involving the perpetrator.

115.71 (d): The interviews with the facility investigators indicated that they would consult with prosecutors on an as needed basis and if time permits. The criminal investigator confirmed that before they conduct any compelled interviews they would consult with prosecutors. A review of investigative reports confirmed none of the closed investigations involved compelled interviews.

115.71 (e): 04.01.301, page 10 states that alleged victims of sexual abuse shall not be required to submit to truth telling verification examinations such as voice stress analysis or polygraph exam as part of or as a condition of the investigation. The interviews with the administrative and criminal investigators confirmed that the agency does require IIC victims of sexual abuse to submit to a polygraph tests or any other truth-telling devices. Further the administrative investigator stated that

credibility is based on an individual basis by incident. The criminal investigator stated that credibility is assessed on an individual basis and is not determined by a person's status. Interviews with IICs who reported sexual abuse confirmed none of the three were required to take a polygraph or truth telling device test.

115.71 (f): 01.12.120, page 3 states that the supervisor of the internal investigation team shall submit an initial report, verbal or written, to the CAO within 48 hours of the incident and shall submit a final written report utilizing the Report of Investigation, DOC 0262, within ten working day from the conclusion of the investigation. A review of seven investigations indicated all seven had a completed administrative investigation. All seven were documented in a written report with information related to the initial allegation, a description of statements/interviews with the alleged victim, perpetrator(s) and/or witnesses, if applicable, whether video was reviewed and investigatory facts and findings. The interviews with investigative staff confirmed that all administrative investigations are documented in a written report and include: an introduction, any and all information gathered during the investigation, interviews, discipline, attachments and a conclusion. The investigators further stated that they review reports and take information from interviews to determine if staff actions or failure to act contributed to the sexual abuse. The investigators stated they compare what was done to policies and procedures. The criminal investigator further confirmed that they would review logbooks, video and interview all parties to determine if staff actions or failure to act contributed to the abuse.

115.71 (g): 01.12.120, page 3 states that the supervisor of the internal investigation team shall submit an initial report, verbal or written, to the CAO within 48 hours of the incident and shall submit a final written report utilizing the Report of Investigation, DOC 0262, within ten working day from the conclusion of the investigation. There were zero criminal investigations completed and as such there were zero available for review during the on-site portion of the audit. The interview with the criminal investigator confirmed that the criminal investigation would be documented on the DOC 0262 (Report of Investigation). The report would contain a thorough description of physical, interview and documentary evidence. He stated it would also include all attachments such as: statements, video, audio, physical, etc.

115.71 (h): The PAQ indicated that substantiated allegations of conduct that appear to be criminal are referred for prosecution. 04.01.301, page 11 states that upon conclusion of the investigation, if applicable, the case shall be reviewed with the appropriate State's Attorney for possible referral for prosecution. The PAQ noted there were zero allegations referred for prosecution since the last PREA audit. The updated PAQ indicated there was one substantiated allegations of sexual abuse that was referred for prosecution since the last PREA audit. A review of documentation confirmed there was one substantiated agency investigation from 2021 that was referred for prosecution. The facility provided documentation indicating that the State

Attorney declined to prosecute and the case was closed. The interviews with the facility investigators indicated they refer cases for prosecution when there is a criminal element or a crime has been committed and they determine the investigation is substantiated. The interview with the criminal investigator indicated that all criminal investigations are typically referred for prosecution, especially those that are substantiated.

115.71 (i): The PAQ indicated that the agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. A review of a sample of historic investigations confirmed retention is being met.

115.71 (j): The facility investigators confirmed that if a staff member resigns or is no longer employed and/or an IIC departs the facility/agency custody they still continue the investigations. The interview with the criminal investigator confirmed that an individual in custody being released or an employee separating from the agency has no bearing on the investigation and it would proceed accordingly.

115.71 (k): The auditor is not required to audit this standard.

115.71 (l): 04.01.301 states that upon conclusion of the investigation the results shall be forwarded to the Chief of Operations who shall report the incident to the Illinois State Police, where appropriate. Additionally, the MOU with the Illinois State Police (signed in 2019) indicates that they conduct investigations related to sexual assault involving staff on staff or staff on IIC. The PREA Coordinator stated that cases which are referred to the Illinois State Police are assigned an external investigator from IDOC's Office of Investigations & Intelligence. The IDOC external investigator would ensure updates are provided to the facility and PREA Coordinator, as appropriate. The Warden stated that the facility would remain informed of the progress of the investigation through the Investigative Lieutenant. He stated the Lieutenant serves as a liaison to the external entity. The PCM stated that Internal Affairs staff would remain in contact with the outside investigators. The interviews with the facility investigators indicated they serve as a liaison when an outside agency investigates. The criminal investigator stated that he fully cooperates with the outside investigator and stays informed of the progress of their investigation.

Based on a review of the PAQ, 04.01.310, 01.12.101, 01.12.112, 01.12.115, 01.12.120, 01.12.125, the MOU with the State Police, investigative reports, investigative training records and information from interviews with the Warden, PREA

Coordinator, PREA Compliance Manager and investigator, indicate that this standard appears to require corrective action. None of the seven involved a review of prior complaints.

#### Corrective Action

The facility will need to train investigators on the requirement of reviewing prior complaints and how to document the review in the investigative report. A copy of the training will need to be provided as well as examples of investigative reports during the corrective action period.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training
2. Credibility Assessment Training
3. List of Sexual Abuse Allegations During the Corrective Action Period
4. Investigative Reports

The facility provided a training memo that discussed the requirement of reviewing prior complaints of the alleged perpetrators(s). Additionally, training documentation was provided that went over credibility assessments (PREA Resource Center Training). Staff signatures (investigators) were provided confirming they received and understood the training.

A list of sexual abuse allegations during the corrective action period were provided. The PCM advised that they had not completed the training with the investigators prior to the allegations being reported. No new allegations were reported. The facility provided the investigative reports for the three allegations as well as a memo that advised information related to a review of prior complaints will be included in the



	<p>investigative reports moving forward. The most recently completed investigation was updated with a memo from the investigation outlining that prior complaints were reviewed for the alleged perpetrator.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.72 Evidentiary standard for administrative investigations</b>	
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Prison Rape Elimination Act (PREA) for Investigators Training Curriculum</li> <li>4. Investigative Reports</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interviews with Investigative Staff</li> </ol> <p>Findings (By Provision):</p> <p>115.72 (a): The PAQ stated that the agency imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated. 04.01.301, page 10 states that the Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Additionally, the PREA for Investigators Training Curriculum includes information on the elements to substantiate an investigation (preponderance of evidence). A review of the seven investigations indicated three were sexual abuse allegations and were all deemed unsubstantiated. There was one substantiated IIC-on-IIC sexual harassment investigation that was based on preponderance of the evidence. It should be noted there were two investigations completed for allegations</p>

	<p>that did not meet the definition of sexual abuse or sexual harassment. Both of these investigations were deemed unsubstantiated, however the upon review the auditor determined they should have been unfounded. The interviews with the investigators indicated they utilize a preponderance of the evidence when determining whether to substantiated an administrative investigations.</p> <p>Based on a review of the PAQ, 04.01.301, PREA Investigators Training Curriculum, investigative reports and information from the interview with the investigator, it is determined that this standard appears to be compliant.</p> <p>Recommendation</p> <p>The auditor highly recommends that the facility provide training to investigators on investigative outcomes and for the process of investigations when allegations are consensual or are determined not to meet the definition of sexual abuse or sexual harassment.</p>
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<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>4. Investigative Reports</li> <li>5. Victim Notifications</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interview with the Warden</li> <li>2. Interviews with Investigative Staff</li> </ol>

### 3. Interviews with Individuals In Custody who Reported Sexual Abuse

#### Findings (By Provision):

115.73 (a): The PAQ indicated that the agency has a policy requiring that any IIC who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. 04.01.301, page 10 states that the alleged victim will be notified, in writing, of the outcome of the investigation. The PAQ stated there were four completed sexual abuse investigation in the previous twelve months and all four had a verbal or written victim notification. The updated PAQ indicated there were seven investigations completed and all seven had a victim notification. A review of three sexual abuse investigations indicated all three had a completed investigation with a victim notification. Further, the facility had documented victim notification for the four allegations that involved sexual harassment or did not meet the definition of sexual abuse or sexual harassment, exceeding the requirements of this provision. Interviews with the Warden and the investigators confirm that IICs are informed of the outcome of the investigation into their allegation. Interviews with IICs who reported sexual abuse indicated one was aware he was to be informed of the outcome of the investigation. All three stated they were provided the outcome of the investigation into their allegation in writing a month or two after the report.

115.73 (b): The PAQ indicate that if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the IIC of the outcome of the investigation. The PAQ stated there were zero investigations completed by an outside agency in the previous twelve months. 04.01.301, page 10 states that the alleged victim will be notified, in writing, of the outcome of the investigation. A review of investigations confirmed none were investigated by an outside agency and as such no notifications under this provision were required.

115.73 (c): The PAQ indicated following an IIC's allegation that a staff member has committed sexual abuse against the IIC, the agency/facility subsequently informs the IIC (unless the agency has determined that the allegation is unfounded) whenever: the staff member is no longer posted within the IIC's unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. Additionally, the PAQ indicated that there has been a substantiated or unsubstantiated complaint (i.e., not unfounded) of sexual abuse committed by a staff

member against an IIC in an agency facility in the past 12 months and that in each case the agency subsequently informed the IIC whenever: the staff member was no longer posted within the IIC's unit; the staff member was no longer employed at the facility; the staff member has been indicated on a charge related to sexual abuse within the facility or the staff member has been convicted on a charge related to sexual abuse within the facility. The PREA Manual, page 40 states that following an IIC's allegation that a staff member has committed sexual abuse against the IIC, the agency shall subsequently inform the IIC (unless the agency has determined that the allegation is unfounded) whenever: the staff member is no longer posted within the IIC's unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. The PREA Manual further states that an assessment shall be completed to determine if actions described above are warranted in accordance with section 115.65. The actions may not be appropriate in all cases. Offenders shall be notified only if there is a link between the listed actions in this section and an incident of sexual abuse. The timing of such notifications shall not interfere with any pending criminal or administrative investigations. A review of three sexual abuse investigations indicated two were staff-on-IIC allegations. Neither of the investigations were substantiated or involved any notifications under this provision. Interviews with IICs who reported sexual abuse indicated that all three had an allegation against staff. The IICs advised they were not informed anything about the staff member under this provision.

115.73 (d): The PAQ indicated following an IIC's allegation that he or she has been sexually abused by another IIC in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The PREA Manual, page 40 states that following an IIC's allegation that he or she has been sexually abused by another IIC, the agency shall 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; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. A review of three sexual abuse investigations indicated one was IIC-on-IIC sexual abuse. The investigation was not substantiated and as such there were zero notifications required under this provision. Interviews with IICs who reported sexual abuse indicated none were against another IIC and as such notifications under this provision were not applicable.

115.73 (e): The PAQ indicated the agency has a policy that all notifications to IICs described under this standard are documented. 04.01.301, page 10 states that the alleged victim will be notified, in writing, of the outcome of the investigation. The PAQ stated there were eleven notification made pursuant to this standard. The updated

	<p>PAQ indicated there were seven notifications made pursuant to this standard. victim notification. Further, the facility had documented victim notification for the four allegations that involved sexual harassment or did not meet the definition of sexual abuse or sexual harassment.</p> <p>115.73 (f): This provision is not required to be audited.</p> <p>Based on a review of the PAQ, 04.01.301, the PREA Manual, investigative reports, victim notification memos and information from interviews with the Warden and the investigator indicate that this standard appears to be compliant.</p>
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115.76	Disciplinary sanctions for staff
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Administrative Directive 03.01.120 Employee Review Hearing</li> <li>4. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>5. Investigative Reports</li> </ol> <p>Findings (By Provision):</p> <p>115.76 (a): The PAQ indicated that staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. 04.01.301, page 11 states that all terminations for violating the 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 PREA Manual, page 41 states that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse and</p>

sexual harassment policies. A review of investigative reports indicated that there were two staff-on-IIC sexual abuse allegation but neither were substantiated.

115.76 (b): The PREA Manual, page 41 states termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. It further states that administrative discipline shall be conducted using the Employee Review Hearing Process and the collective bargaining agreement. Any decision made on the proposal shall be in accordance with all applicable laws, rules and regulations. The PAQ indicated there were zero staff members who violated the sexual abuse or sexual harassment policies in the previous twelve months and zero staff members who was terminated (or resigned prior to termination) for violating the agency's sexual abuse or sexual harassment policies. A review of investigative reports indicated that there were two staff-on-IIC sexual abuse allegation but neither were substantiated.

115.76 (c): The PAQ indicated that the disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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. The PAQ indicated there were zero staff that were disciplined short of termination for violating the sexual abuse or sexual harassment policies. The PREA Manual, page 41 states that disciplinary sanctions for violations of agency policy relating to sexual abuse or sexual harassment shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. 03.01.120 further describes the employee disciplinary review process. A review of investigative reports indicated that there were two staff-on-IIC sexual abuse allegation but neither were substantiated.

115.76 (d): The PAQ indicated 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, are reported to law enforcement agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies. 04.01.301, page 11 states that all terminations for violating the 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 PAQ indicated there were no staff members who were reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual or sexual harassment policies. A review of investigative reports indicated that there were two staff-on-IIC sexual abuse allegation but neither were substantiated.

Based on a review of the PAQ, 04.01.301, 03.01.120, the PREA Manual and investigative reports, this standard appears to be compliant.

**115.77 Corrective action for contractors and volunteers**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Investigative Reports

Interviews:

1. Interview with the Warden

Findings (By Provision):

115.77 (a): The PAQ indicated that agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies and that any contractor or volunteer who engages in sexual abuse be prohibited from contact with IICs. 04.01.301, page 11 states that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies unless the activity was clearly not criminal, and to relevant licensing bodies. The PAQ indicated that there have been no contractors or volunteers who violated the sexual abuse or sexual harassment policies within the previous twelve months and as such none were reported to law enforcement or relevant licensing bodies. A review of investigative reports confirmed there were zero contractors or volunteers who violated the agency's sexual abuse or sexual harassment policies.

115.77 (b): The PAQ indicated that the facility takes appropriate remedial measures

and considers whether to prohibit further contact with IICs in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. 04.01.301, page 11 states that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies unless the activity was clearly not criminal, and to relevant licensing bodies. The interview with the Warden indicated that if a volunteer or contractor violated the sexual abuse and/or the sexual harassment policies they would no longer be allowed on facility grounds.

Based on a review of the PAQ, 04.01.301, investigative reports and information from the interview with the Warden, this standard appears to be compliant.

**115.78 Disciplinary sanctions for inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Illinois Administrative Code 20.504
4. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)
5. Investigative Reports

Interviews:

1. Interview with the Warden
2. Interviews with Medical and Mental Health Staff

Findings (By Provision):

115.78 (a): The PAQ indicated that IICs are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding and/or a



criminal finding that an IIC engaged in IIC-on-IIC sexual abuse. 04.01.301, page 10 states that upon conclusion of the investigation disciplinary reports shall be completed, served and processed, where warranted. 20.504, page 2 states that no offender shall be found guilty of any violation without a hearing before the Adjustment Committee or Program Unit. 20.504 further describes the formal disciplinary process required. The PAQ stated there were zero administrative finding of IIC-on-IIC sexual abuse and zero criminal findings of IIC-on-IIC sexual abuse. The updated PAQ indicated there was one administrative finding on IIC-on-IIC sexual harassment in the previous twelve months. A review of investigative reports confirmed there were zero substantiated IIC-on-IIC sexual abuse investigations. There was one substantiated IIC-on-IIC sexual harassment investigation. The IIC perpetrator received discipline through the disciplinary process, including restrictive housing time and C-grade time.

115.78 (b): 20.507, pages 2-3 stated that in determining the appropriate sanctions, the Adjustment Committee or Program Unit, the CAO and the Director shall consider, among other matters, mitigating or aggravating factors including; the offenders age, medical and mental health state, if the offender was determined to be mentally ill, the extent and degree of participation in the commission of the offense and the offender's prior disciplinary record. The Warden confirmed that if an IIC perpetrator is found to have violated the sexual abuse or sexual harassment policies he/she would be subject a disciplinary ticket and could also be charged through the District Attorney's office. The Warden confirmed that sanctions are consistent in the disciplinary process and that sanctions would be commensurate with the nature and circumstances of the abuse committed, the IIC's disciplinary history, and the sanctions imposed for comparable offenses by other IICs with similar histories.

115.78 (c): 20.507, pages 2-3 stated that in determining the appropriate sanctions, the Adjustment Committee or Program Unit, the CAO and the Director shall consider, among other matters, mitigating or aggravating factors including; the offenders age, medical and mental health state, if the offender was determined to be mentally ill, the extent and degree of participation in the commission of the offense and the offender's prior disciplinary record. The interview with the Warden confirmed that the disciplinary process considers whether the IIC's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

115.78 (d): The PAQ indicated the facility does not offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. It further stated that sex offender treatment is only offered at Big Muddy River Correctional Center and Taylorville Correctional Center. Interviews with medical and mental health staff indicated that they do not have sex offender treatment at the facility and that they typically do not provide services to the perpetrator. The mental

	<p>health care staff stated that their primary focus is the victim. Medical stated they would provide services to IICs but they would not require them to participate in order to gain access to any other programs or privileges.</p> <p>115.78 (e): The PAQ indicated that the agency disciplines IICs for sexual conduct with staff only upon finding that the staff member did not consent to such contact.</p> <p>115.78 (f): The PAQ indicated that the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. The PREA Manual, page 42 states that the maintenance of an effective sexual abuse prevention policy, and general secure and orderly running of a facility, requires that offenders be held responsible for manipulative behavior and intentionally making false allegations. Allegations of false reports shall be considered by staff in accordance with the procedures and standards founds within Illinois Administrative Code 507, Administration of Discipline.</p> <p>115.78 (g): The PAQ indicated that the agency prohibits all sexual activity between IICs. It further indicated that if the agency prohibits all sexual activity between IICs and disciplines IICs for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.</p> <p>Based on a review of the PAQ, 04.01.301, 20.507, the PREA Manual, investigative reports and information from interviews with the Warden and medical and mental health care staff, this standard appears to be compliant.</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Standard Operating Procedural (SOP) Manual for Mental Health</li> </ol>

4. Screening for Potential Sexual Victimization or Sexual Abuse (DOC 0494)

5. Medical/Mental Health Documents

Interviews:

1. Interviews with Staff Responsible for Risk Screening

2. Interviews with Medical and Mental Health Staff

3. Interviews with Individuals In Custody who Disclose Sexual Victimization at Risk Screening

Site Review Observations:

1. Observations of Risk Screening Area

2. Observation of Individuals In Custody Medical and Classification Files

Findings (By Provision):

115.81 (a): The PAQ indicated that all IICs at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner and the follow-up meeting was offered within fourteen days. The PAQ further indicated that medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services. 04.01.301, page 6 states that if it is determined that the offender was previously a victim of sexual abuse, the facility PCM shall notify medical and mental health staff within fourteen days of the screening. The PAQ noted that 100% of those IICs who reported prior victimization were seen within fourteen days by medical or mental health. The interviews with the staff responsible for the risk screening indicated that IICs are offered a follow-up with medical or mental health care staff. Neither staff were aware of the timeframe that the IIC would be seen by mental health. Interviews with two IICs who disclosed sexual victimization during the risk screening indicated neither were offered a follow-up with medical or mental health care staff. The auditor requested documentation for five IICs who disclosed prior sexual victimization and accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received.

115.81 (b): The PAQ indicated that all prison IICs who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.41, are offered a

follow-up meeting with a mental health practitioner and the follow-up meeting was offered within fourteen days. The PAQ further indicated that medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services. 04.01.301, page 7 states that if it is determined that the offender previously perpetrated sexual abuse, the facility PCM shall notify mental health staff within fourteen days of the screening. The PAQ noted that 100% of those IICs who reported prior perpetration were seen within fourteen days by medical or mental health. The interviews with the staff responsible for the risk screening indicated that IICs are offered a follow-up with medical or mental health care staff. Neither staff were aware of the timeframe that the IIC would be seen by mental health. During documentation review the auditor identified two IICs with prior sexual abusiveness. The auditor requested documentation for the two IICs who were identified with prior sexual abusiveness that accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received.

115.81 (c): The facility is not a jail and as such this provision is not applicable.

115.81 (d): The PAQ indicated that information related to sexual victimization or abusiveness that occurred in an institutional setting is not strictly limited to medical and mental health practitioners, however it stated that the information is only shared with staff to assist with security and management decisions. 04.01.301, page 5 states that access to information related to sexual abuse occurring in an correctional setting shall be treated as confidential and limited to staff directly related to the assessment, treatment, placement or investigations of the offender to the extent possible when ensuring the safety and security of the offender. Medical records are all paper and the records area is staffed 7am-10pm Monday through Friday. The records door is to remain locked at all times and only medical and mental health care staff have access. Medical and mental health care staff are the only ones with access to the records. Medical records are only able to be viewed or provided to specific staff (i.e. investigator or Warden). Investigative files are paper and electronic. Only Internal Affairs staff have access to the investigations. Risk screening information is maintained in the electronic Offender 360 program and/or in the IIC's master file. Master files are maintained in records which is staffed Monday through Friday and the area is locked when not staffed. Access to the master file is to those with a need to know. During the tour the auditor had a security staff member pull up the electronic system to see what was able to be viewed. The staff was able to view the questions and the response of each IIC's risk assessment. During the interim report period the PREA Coordinator corrected this issue. The system was previously restricted and the agency retracted the restriction due to a technical issue. Once it was identified that access was again available to all staff, the PC took immediate action. The auditor was provided confirmation during the interim report period that the restrictions were once again implemented. The auditor was also able to test the restrictions during another IDOC audit that was conducted after East Moline's on-site portion of the audit.

15.81 (e): The PAQ indicated that medical and mental health practitioners obtain informed consent from IICs before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the IIC is under the age of eighteen. 04.01.301, page 5 states that informed consent shall be required before utilizing information regarding a sexual victimization that occurred outside of a correctional setting. The SOP Manual for Mental Health, page 46 clinicians should clearly specify any limits of confidentiality. Offender disclosures are considered to be confidential and privileged with the following exceptions: threats to physically harm self-and/or others, threats to escape or otherwise disrupt or breach the security of the institution and information about an identifiable minor child or elderly/disabled person who has been the victim of physical or sexual abuse. Interviews with medical and mental health staff indicate that the medical staff would obtain informed consent prior to reporting any sexual abuse that did not occur in an institutional setting. The mental health staff indicated she had not encountered that at the facility and she was unaware. Both staff stated there the facility does not house anyone under eighteen and has not housed anyone under eighteen in years.

Based on a review of the PAQ, 04.01.301, SOP Manual for Mental Health, DOC 0494, medical and mental health documents, information from interviews with staff who perform the risk screening, medical and mental health care staff and IICs who disclosed victimization during the risk screening indicate that this standard requires corrective action. The auditor requested documentation for five IICs who disclosed prior sexual victimization and accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received. Interviews with two IICs who disclosed sexual victimization during the risk screening indicated neither were offered a follow-up with medical or mental health care staff. The auditor requested documentation for the two IICs who were identified with prior sexual abusiveness that accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received. Interviews with medical and mental health staff indicate that the medical staff would obtain informed consent prior to reporting any sexual abuse that did not occur in an institutional setting. The mental health staff indicated she had not encountered that at the facility and she was unaware.

#### Corrective Action

The facility will need to provide the requested documentation. If it does not exist the facility will need to train staff on the process under provision (a) and (b). A copy of the training will need to be provided. The facility will need to provide examples during the corrective action period of IICs who disclose prior sexual victimization and IICs identified with prior sexual abusiveness and their associated mental health follow-up

documentation. The facility will also need to train medical and mental health care staff on the informed consent process under provision (e). A copy of the training will need to be provided.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training
2. Individual in Custody Risk Assessments
3. Mental Health Follow-Up Documentation

The facility provided a training memo, however the training memo was only the standard language. As such the auditor advised that the training was not adequate as it did not provide information on the procedure for mental health follow-ups. Additionally, four examples were provided, one was past the fourteen day timeframe and three did not include enough documentation for the auditor to confirm if they were completed within fourteen days.

The facility provided a second training that was completed that included a flow chart and direction on the process for the mental health follow-up. Clinical and mental health staff signature were provided confirming they received and understood the training.

Six examples of those that disclosed prior sexual victimization were provided, however all were provided the mental health follow-up past the fourteen day timeframe.

Two examples from April were provided that had IICs who were identified with prior sexual abusiveness. One declined the follow-up and one accepted the follow-up. The one that accepted the follow-up was completed within fourteen days.

	<p>Further, the facility provided documentation that outlined there was limited IIC transfers to East Moline in March and April and as such there were not additional examples to provide. The six examples provided that were completed but past the timeframe were from January through April. The additional two were from April. There were no additional example available, however the auditor determined that the facility had implemented the corrective action in April and the limited examples after April were correct.</p> <p>Additionally, the facility provided training with medical and mental health staff on the process of informed consent. Signatures were provided confirming they received and understood the training.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. Medical and Mental Health Documents</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Interviews with Medical and Mental Health Staff</li> <li>2. Interviews with First Responders</li> <li>3. Interviews with Individuals In Custody who Reported Sexual Abuse</li> </ol> <p>Site Review Observations:</p>

## 1. Observations of Medical and Mental Health Areas

### Findings (By Provision):

115.82 (a): The PAQ indicated that IIC victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services and that the nature of scope of services are determined by medical and mental health practitioners according to their professional judgment. The PAQ further indicates that medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis. 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5 and shall be evaluated by mental health services or a crisis intervention team member within 24 hours to assess the need for counseling services. During the tour the auditor observed the health services area. Health Services included a reception area, exam rooms, treatment rooms, an ancillary area and a small infirmary. The ancillary area was a large room with solid doors. The exam and treatment rooms were rooms with small windows. Mobile barriers were observed in health services to provide additional privacy when needed. The infirmary was made up of three rooms with multiple beds. Adequate privacy was provided. A review of three sexual abuse allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. Interviews with medical and mental health care staff confirmed that IICs receive timely and unimpeded access to emergency medical treatment and crisis intervention service. Staff stated services are provided immediately. Both staff further stated that treatment and services would be based on professional judgment as well as other things such as protocol. Interviews with IICs who reported sexual abuse indicated all three were offered medical and/or mental health services.

115.82 (b): 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5 and shall be evaluated by mental health services or a crisis intervention team member within 24 hours to assess the need for counseling services. Page 9 (Paragraph II.G.5) further states that treatment shall be provided by a certified SAFE or SANE at a local emergency room and that the medical examination provided by Department facilities shall include a general physical examination for recent sexual abuse. The interview with the security



first responder indicated duties after a report of sexual abuse include; separating the two individuals, making sure they do not shower or take action to destroy evidence, preserve evidence where it happened (secure scene) and notify medical and the chain of command. The non-security first responder stated non-security first responder duties include reporting it to the supervisor and making sure the individual is safe.

115.82 (c): The PAQ indicated that IIC victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. 04.01.301, page 9 states that a general physical examination for recent sexual abuse shall include, but not be limited to: a blood test (RPR for Syphilis); culture smears for seminal fluid, Gonorrhea, Chlamydia and other Sexually Transmitted Diseases (STD) as appropriate; Hepatitis C antibody test and Hepatitis B surface antigen and antibody blood test and an HIV test and counseling shall be offered. A review of three sexual abuse allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. None of the three IICs who reported sexual abuse had an allegation involving penetration and as such none required access under this provision. Interviews with medical and mental health care staff confirm that IICs receive timely information and access to emergency contraception and sexually transmitted infection prophylaxis. The interviews with IICs who reported sexual abuse indicated that none involved penetration or touching that would require information and access to sexually transmitted infection prophylaxis.

115.82 (d): The PAQ indicated that treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. 04.01.301, page 9 states that offenders shall not be charged a co-payment for medical treatment, including forensic medical examinations, obtained for alleged sexual abuse.

Based on a review of the PAQ, 04.01.301, medical and mental health documents and information from interviews with medical and mental health care staff indicate that this standard appears to be compliant.

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## Auditor Discussion

### Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)
4. Medical and Mental Health Documents

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### Interviews:

1. Interviews with Medical and Mental Health Staff
2. Interviews with Individuals In Custody who Reported Sexual Abuse

### Site Review Observations:

1. Observations of Medical Treatment Areas

### Findings (By Provision):

115.83 (a): The PAQ indicated the facility offers medical and mental health evaluation and, as appropriate, treatment to all IICs who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5 and shall be evaluated by mental health services or a crisis intervention team member within 24 hours to assess the need for counseling services. Additionally, 04.01.301, page 6 states that if it is determined that the offender was previously a victim of sexual abuse, the facility PCM shall notify medical and mental health staff within fourteen days of the screening. During the tour the auditor observed the health services area. Health Services included a reception area, exam rooms, treatment rooms, an ancillary area and a small infirmary. The ancillary area was a large room with solid doors. The exam and treatment rooms were rooms with small windows. Mobile barriers were observed in health services to provide additional privacy when needed. The infirmary was made up of three rooms with multiple beds. Adequate privacy was provided. A review of three sexual abuse

allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. The auditor requested documentation for five IICs who disclosed prior sexual victimization and accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received.

115.83 (b): 04.01.301, page 8 states that any offender who alleges to be a victim of sexual abuse shall be referred to health services for examination, treatment and evidence collection in accordance with Paragraph II.G.5 and shall be evaluated by mental health services or a crisis intervention team member within 24 hours to assess the need for counseling services. A review of three sexual abuse allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. Interviews with medical and mental health care staff confirmed that they provide on-going and follow-up services to IIC victims of sexual abuse. A few of the services include therapy, follow-up with the psychiatrist, outside services and a physical assessment. Interviews with IICs who reported sexual abuse indicated all three were provided follow-up services.

115.83 (c): The facility provides access to medical and mental health staff on-site and also transports IICs to the local hospital for treatment that is not available at the facility. All medical and mental health care staff are required to have the appropriate licensure and credentials. A review of three sexual abuse allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. Interviews with medical and mental health care staff confirm that the services they provide are consistent with the community level of care.

115.83 (d): The PAQ indicated that female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests. Further communication with the PC indicated that this provision does not apply as the facility does not house female IICs. 04.10.301, page 10 states female victims of sexual abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the sexual abuse, such victims shall receive timely and comprehensive information about and timely access to all lawfully pregnancy-related medical services. The facility does not house female IICs and as such this provision does not apply.

115.83 (e): The PAQ indicated that if pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. Further communication with the PC indicated that this provision does not apply as the facility does not house female IICs. 04.10.301, page 10 states female victims of sexual abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the sexual abuse, such victims shall receive timely and comprehensive information about and timely access to all lawfully pregnancy-related medical services. The PREA Manual, page 45 states that if pregnancy results from the conduct described in paragraph (d) of this section (sexually abusive vaginal penetration), such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services. It further states that Department healthcare providers shall deliver comprehensive prenatal counseling and care for pregnant female offenders. The facility does not house female IICs and as such this provision does not apply.

115.83 (f): The PAQ indicated that IIC victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. 04.01.301, page 9 states that a general physical examination for recent sexual abuse shall include, but not be limited to: a blood test (RPR for Syphilis); culture smears for seminal fluid, Gonorrhea, Chlamydia and other Sexually Transmitted Diseases (STD) as appropriate; Hepatitis C antibody test and Hepatitis B surface antigen and antibody blood test and an HIV test and counseling shall be offered. A review of three sexual abuse allegations indicated all three were provided medical and mental health services. Further the four IICs who reported sexual harassment or an allegation that did not meet the definition of sexual abuse or sexual harassment were also documented with medical and mental health services. None of the three IICs who reported sexual abuse had an allegation involving penetration and as such none required access under this provision. Interviews with IICs who reported sexual abuse indicated none had an allegation that involved penetration or the need for testing for sexually transmitted infections.

115.83 (g): The PAQ indicated that treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. 04.01.301, page 9 states that offenders shall not be charged a co-payment for medical treatment, including forensic medical examinations, obtained for alleged sexual abuse. The interviews with IICs who reported sexual abuse confirmed none were required to pay for medical or mental health services.

115.83 (h): The PAQ indicated that the facility attempts to conduct a mental health evaluation of all known IIC-on-IIC abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health

practitioners. The PREA Manual, page 46 states that all prisons shall attempt to conduct a mental health evaluation of all known IIC-on-IIC abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. There were zero IIC-on-IIC sexual abuse allegations that were deemed substantiated and as such there were no confirmed IIC-on-IIC abusers who required an evaluation under this provision. Interviews with medical and mental health staff indicate that internal affairs offers mental health services to the victim and abuser.

Based on a review of the PAQ, 04.01.301, the PREA Manual, medical and mental health documents, observations made during the tour and information from interviews with medical and mental health care staff, this standard appears to require corrective action. The auditor requested documentation for five IICs who disclosed prior sexual victimization and accepted a mental health follow-up, however at the issuance of the interim report the documentation had not yet been received. Interviews with medical and mental health staff indicate that internal affairs offers mental health services to the victim and abuser.

#### Corrective Action

The facility will need to provide the requested documentation. If it does not exist the facility will need to train staff on the process under 115.81 and provision (a) of this standard. A copy of the training will need to be provided. The facility will need to provide examples during the corrective action period of IICs who disclose prior sexual victimization and their associated mental health follow-up documentation. The facility will need to train medical and mental health staff on the requirement of mental health evaluation on known IIC-on-IIC abusers. A copy of the training will need to be provided.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training

	<p>2. Individual in Custody Risk Assessments</p> <p>3. Mental Health Follow-Up Documentation</p> <p>The facility provided a training memo, however the training memo was only the standard language. As such the auditor advised that the training was not adequate as it did not provide information on the procedure for mental health follow-ups. Additionally, four examples were provided, one was past the fourteen day timeframe and three did not include enough documentation for the auditor to confirm if they were completed within fourteen days.</p> <p>The facility provided a second training that was completed that included a flow chart and direction on the process for the mental health follow-up. Clinical and mental health staff signature were provided confirming they received and understood the training.</p> <p>Six examples of those that disclosed prior sexual victimization were provided and all had a mental health follow-up provided.</p> <p>Additionally, the facility provided training with medical and mental health staff on the process for attempted mental health evaluations on known IIC-on-IIC abusers. Signatures were provided confirming they received and understood the training.</p> <p>Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.</p>
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<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>1. Pre-Audit Questionnaire</p> <p>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</p>

3. Investigative Reports

4. Sexual Abuse Incident Reviews (DOC 0593)

Interviews:

1. Interview with the Warden

2. Interview with the PREA Compliance Manager

3. Interview with Incident Review Team

Findings (By Provision):

115.86 (a): The PAQ indicated that the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. 04.01.301, page 11 states that the facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. Such reviews shall ordinarily occur within 30 days of the conclusion of the investigation. The PAQ stated there were four criminal and/or administrative investigations of alleged sexual abuse completed at the facility excluding only unfounded incidents. A review of the three sexual abuse investigations indicated all three had a completed sexual abuse incident review.

115.86 (b): The PAQ indicated that the facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation. The original and updated PAQ further stated that in the past twelve months, there were four sexual abuse incident reviews completed within 30 days. 04.01.301, page 11 states that the facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. Such reviews shall ordinarily occur within 30 days of the conclusion of the investigation. A review of the three sexual abuse investigations indicated all three had a completed sexual abuse incident review completed within 30 days of the conclusion of the investigation.

115.86 (c): The PAQ indicated that the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. 04.01.301, page 11 states that the review team, at minimum, shall include: Assistant Chief Administrative Officer; Shift Commander or Lieutenant; a representative from Internal Affairs; the

PCM, a representative from medical and a representative from mental health. The completed sexual abuse incident reviews included upper level management, a supervisor, an investigator and medical and/or mental health care staff. The interview with the Warden confirmed that the facility has a sexual abuse incident review team and the team is made up upper-level management, line supervisor, investigators, medical and mental health care staff.

115.86 (d): The PAQ indicated that the facility prepares a report of its findings from sexual abuse incident reviews including, but not necessarily limited to, determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section and any recommendations for improvement, and submits such report to the facility head and PREA Compliance Manager. 04.01.301, page 11 states that the review, including any reports of findings or any recommendation for improvement, shall be documented on the DOC 0593, Sexual Abuse Incident Review. A review of the completed sexual abuse incident review indicated that they included the required elements under this provision. The reviews were completed using the DOC 0593, which has section for each element as well as recommendations. While the elements were included, the sexual abuse incidents reviews were more a checklist and did not include narrative or information specific to the allegation. Interviews with the Warden, PCM and incident review team member confirmed that these reviews are being completed and they include all the required elements under this provision. The Warden stated that they use the information from the sexual abuse incident reviews to learn from the situation. He stated they use it to find the best place to house someone to keep them safe. The PCM stated that they complete sexual abuse incident reviews and fill out the appropriate paperwork. She stated that she is part of the review team and that she has not noticed any trends. She further stated she has not taken any action after submitting the reports as they have minimal issues at the facility.

115.86 (e): The PAQ indicated that the facility implements the recommendations for improvement or documents its reasons for not doing so. 04.01.301, page 11 states that the DOC 0593 shall be forwarded to the Chief Administrative Officer so recommendations for improvement may be considered. Any recommendation not implemented shall be documented on the DOC 0593 including justification for not doing so. A review of the completed sexual abuse incident review indicated that a section exists for recommendations and corrective action, however none included any recommendations.

Based on a review of the PAQ, 04.01.301, investigative report, sexual abuse incident reviews (DOC 0593) and information from interviews with the Warden, the PCM and a member of the sexual abuse incident review team, this standard appears to require corrective action. A review of the completed sexual abuse incident review indicated that they included the required elements under this provision. The reviews were completed using the DOC 0593, which has section for each element as well as



recommendations. While the elements were included, the sexual abuse incidents reviews were more a checklist and did not include narrative or information specific to the allegation.

#### Corrective Action

The facility will need to train appropriate staff on the requirement of incident specific narrative information. A copy of the training will need to be provided. A list of sexual abuse allegations during the corrective action period and associated sexual abuse incident reviews will need to be provided as well.

#### Verification of Corrective Action Since the Interim Audit Report

The auditor gathered and analyzed the following additional evidence provided by the facility during the corrective action period relevant to the requirements in this standard.

#### Additional Documents:

1. Staff Training
2. List of Sexual Abuse Allegations During Corrective Action Period
3. Sexual Abuse Incident Review

The facility provided a training memo related to sexual abuse incident reviews and narrative specific information related to each element under provision (d). Staff signatures were provided confirming receipt of the training.

A list of sexual abuse allegations during the corrective action period were provided. There were three sexual abuse allegations, however two of the investigations were deemed unfounded. The facility provided the one completed sexual abuse incident review. The review included narrative related to the elements under provision (d). Further the facility conducted a mock investigation with a mock sexual abuse incident review to provide additional training and practice related to sexual abuse incident reviews. A review of the mock sexual abuse incident review was provided and included narrative information.

	Based on the documentation provided the facility has corrected this standard and as such appears to be compliant.
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Checklist</li> <li>4. Investigative Reports</li> <li>5. Annual PREA Report</li> <li>6. Survey of Sexual Victimization</li> </ol> <p>Findings (By Provision):</p> <p>115.87 (a): The PAQ indicated that the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. 04.01.301, pages 12-13 state that the Chief Administrative Officer and the facility PCM shall conduct an annual evaluation of the Sexual Abuse and Harassment Prevention and Intervention Program at their respective facility and submit to the PC a written report of the findings. The report should at minimum include: a review of each incident of sexual abuse or harassment that occurred during the reporting period; program and procedural changes implemented based on recommendations of the review team; training needs to ensure future safety and security; record of referrals to outside community resources; record of referrals for post-release service and statistical data. Policy further states that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's</p>

statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment overall. A review of investigative reports and the PREA Checklist confirm that information/data related to each sexual abuse and sexual harassment allegation is reported and documented. The PREA Checklist is then forwarded to the PC to assist with compiling statistical data to identify trends.

115.87 (b): The PAQ indicated that the agency aggregates the incident-based sexual abuse data at least annually. 04.01.301, pages 12-13 state that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment overall. A review of the Annual PREA Report indicates that it includes agency accomplishments, facilities audited during the year, statistical data and corrective actions. The report compares data from 2014 through the current year.

115.87 (c): The PAQ indicated that the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. A review of the agency's most recent Survey of Sexual Victimization (formerly known as Survey of Sexual Violence) confirms that the agency collects appropriate information using a standardized instrument and reports the appropriate information via the SSV.

115.87 (d): The PAQ indicated that the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. 04.01.301, pages 12-13 state that the Chief Administrative Officer and the facility PCM shall conduct an annual evaluation of the Sexual Abuse and Harassment Prevention and Intervention Program at their respective facility and submit to the PC a written report of the findings. The report should at minimum include: a review of each incident of sexual abuse or harassment that occurred during the reporting period; program and procedural changes implemented based on recommendations of the review team; training needs to ensure future safety and security; record of referrals to outside community resources; record of referrals for post-release service and statistical data. Policy further states that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident

based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment overall.

115.87 (e): The PAQ indicated that the agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of IICs and that data from private facilities complies with SSV reporting regarding content. 04.01.301, pages 12-13 state that the Chief Administrative Officer and the facility PCM shall conduct an annual evaluation of the Sexual Abuse and Harassment Prevention and Intervention Program at their respective facility and submit to the PC a written report of the findings. The report should at minimum include: a review of each incident of sexual abuse or harassment that occurred during the reporting period; program and procedural changes implemented based on recommendations of the review team; training needs to ensure future safety and security; record of referrals to outside community resources; record of referrals for post-release service and statistical data. Policy further states that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment overall. A review of the Annual PREA Report indicates that it includes agency accomplishments, facilities audited during the year, statistical data and corrective actions. The report compares data from 2014 through the current year. The data included information from the contracted private facilities.

115.87 (f): The PAQ indicated that the agency provided the Department of Justice with data from the previous calendar year upon request. 04.01.301, page 13 states that upon request, the report shall be submitted to the Department of Justice.

Based on a review of the PAQ, 04.01.301, investigative reports, the PREA Checklist, the Survey of Sexual Victimization and the Annual PREA Report this standard appears to be compliant.

**Auditor Overall Determination: Meets Standard**

**Auditor Discussion**

Documents:

1. Pre-Audit Questionnaire
2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program
3. Annual PREA Report

Interviews:

1. Interview with the Agency Head
2. Interview with the PREA Coordinator
3. Interview with the PREA Compliance Manager

Findings (By Provision):

115.88 (a): The PAQ indicated that the agency reviews data collected and aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole. 04.01.301, pages 12-13 state that the Chief Administrative Officer and the facility PCM shall conduct an annual evaluation of the Sexual Abuse and Harassment Prevention and Intervention Program at their respective facility and submit to the PC a written report of the findings. The report should at minimum include: a review of each incident of sexual abuse or harassment that occurred during the reporting period; program and procedural changes implemented based on recommendations of the review team; training needs to ensure future safety and security; record of referrals to outside community resources; record of referrals for post-release service and statistical data. Policy further states that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment

overall. A review of the Annual PREA Report indicates that it includes agency accomplishments, facilities audited during the year, statistical data and corrective actions. The report compares data from 2014 through the current year. The interview with the Agency Head indicated that the agency collects data on a quarterly basis and they do trend analysis on the data. He stated that the data assist with identifying hot spots and other variables and they determine action plans for each facility and agency as whole. He further confirmed they utilize the data to determine measures to put in place to correct any issues. The PC confirmed that the agency reviews data that is collected in order to assess and improve the effectiveness of the sexual abuse prevention, detection and response policies. He stated the Agency Head approves the report and that the information is published on the agency website. He further stated that trends are analyzed and appropriate corrective action is taken based off of this information. The interview with the PCM indicated she was not sure how the facility data is utilized but she knows she submits the information to the agency and that the agency report is completed and shared online.

115.88 (b): The PAQ indicated that the annual report includes a comparison of the current year's data and corrective actions with those from prior years and that the annual report provides an assessment of the agency's progress in addressing sexual abuse. 04.01.301, pages 12-13 state that the Chief Administrative Officer and the facility PCM shall conduct an annual evaluation of the Sexual Abuse and Harassment Prevention and Intervention Program at their respective facility and submit to the PC a written report of the findings. The report should at minimum include: a review of each incident of sexual abuse or harassment that occurred during the reporting period; program and procedural changes implemented based on recommendations of the review team; training needs to ensure future safety and security; record of referrals to outside community resources; record of referrals for post-release service and statistical data. Policy further states that upon receipt of the reports from each facility, the agency PC shall assess the overall effectiveness of the Department's Sexual Abuse and Harassment Prevention and Intervention Program and submit a written report to the Director that has at minimum: statistical data and corrective action by facility; aggregated incident based sexual abuse or harassment data for the Department; perceived areas of concern and recommended or implemented improvements; a comparison of the current year's statistical data and corrective action with those of previous reporting periods; and an assessment of the Department's progress in addressing sexual abuse or harassment overall. A review of the Annual PREA Report indicates that it includes agency accomplishments, facilities audited during the year, statistical data and corrective actions. The report compares data from 2014 through the current year.

115.88 (c): The PAQ indicated that the agency makes its annual report readily available to the public at least annually through its website and that the annual reports are approved by the Agency Head. 04.01.301, page 13 states that the annual report shall be made available on the Department's website no later than June 30th of

the year subsequent to the reporting period. The interview with the Agency Head confirmed that he reviews and approves the annual report. A review of the website confirmed that the current annual report as well as prior annual reports are available for review.

115.88 (d): The PAQ indicated that when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility and that the agency indicates the nature of material redacted. 04.01.301, page 13 states that the final report shall not contain any personal identifiers. The Department may redact information on the posted report if said information would present a clear and specific threat to the safety and security of a facility or the Department. A review of Annual PREA Report confirmed there was no personal identifying information included nor any security related information. The report did not contain any redacted information. The interview with the PC indicated that confidential and sensitive individual in custody or staff information is redacted. In consultation with the Legal Department, a determination would be made regarding what information would be redacted and justification for such redaction would be provided.

Based on a review of the PAQ, 04.01.301, the Annual PREA Report, the website and information obtained from interviews with the Agency Head, PC and PCM, this standard appears to be compliant.

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Pre-Audit Questionnaire</li> <li>2. Administrative Directive 04.01.301 Sexual Abuse and Harassment Prevention and Intervention Program</li> <li>3. PREA Sexual Abuse and Harassment Prevention and Intervention Program Manual (PREA Manual)</li> <li>4. Annual PREA Report</li> </ol>

Interviews:

1. Interview with the PREA Coordinator

Findings (By Provision):

115.89 (a): The PAQ indicated that the agency ensures that incident-based and aggregate data are securely retained. The PREA Manual, page 50 states that the agency shall ensure that data collected pursuant to 115.87 are securely retained. The interview with the PREA Coordinator indicated that all identifying information regarding PREA allegations is treated as confidential and maintained in secure databases and secured drives. Any hard-copy documents are maintained via double-locked storage.

115.89 (b): The PAQ indicated that agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. 04.01.301, page 14 states the annual report shall be made available on the Department's website no later than June 30th of the year subsequent that of the reporting period. A review of the website confirmed that the current annual report, which includes aggregated data, as well as prior annual reports are available for review.

115.89 (c): The PAQ indicated that before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. 04.01.301, page 13 states that the final report shall not contain any personal identifiers. A review of the Annual PREA Report confirmed there was no personal identifying information included nor any security related information. The report did not contain any redacted information.

115.89 (d): The PAQ indicated that the agency maintains sexual abuse data collected pursuant to Standard 115.87 for at least ten years after the date of initial collection, unless federal, state or local law requires otherwise. 04.01.301, page 13 states that all reports and statistical data shall be retained for a period of no less than ten years. A review of prior Annual PREA Reports confirmed that data is available from 2014 to current.

Based on a review of the PAQ, 04.01.301, the Annual PREA Report, the agency website and information obtained from the interview with the PREA Coordinator, this



	standard appears to be compliant.
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Findings (By Provision):</p> <p>115.401 (a): The facility is part of the Illinois Department of Corrections. All facilities were audited in the previous three-year audit cycle and audit report are found on the agency's website.</p> <p>115.401 (b): The facility is part of the Illinois Department of Corrections. The Department has a schedule for all their facilities to be audited within the three-year cycle, with one third being audited in each cycle. The facility is being audited in the third year of the three-year cycle.</p> <p>115.401 (h) - (m): The auditor had access to all areas of the facility; was permitted to review any relevant policies, procedure or documents and was permitted to conduct private interviews.</p> <p>115.401 (n): The auditor observed the audit announcement in each housing unit and in many common areas on bright colored paper. The audit announcements were on letter size paper and were in English and Spanish. The audit noticed advised the IICs that correspondence with the auditor would remain confidential unless the IIC reported information such as sexual abuse, harm to self or harm to others. Mail to the auditor is treated by privileged mail.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Findings (By Provision):

	115.403 (f): The agency has audit reports published to their website for all audits completed during the previous three, three year audit cycles.
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<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.)	yes
	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.)	yes
<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.)	yes
<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	yes

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
<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.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

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

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



	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
<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	yes

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

	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.)	yes
	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).)	na
<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	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<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	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
<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	yes

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

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

	information is not exploited to the inmate’s detriment by staff or other inmates?	
<b>115.42 (a) 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) 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) 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	yes

	present management or security problems?	
<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	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
<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) 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) 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) 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) 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	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
<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.	no
<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	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<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.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
<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.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<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.)	yes
<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,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<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	yes

	abuse or sexual harassment or retaliation?	
<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	yes

	response to an incident of sexual abuse?	
<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?	yes
<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	yes



	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	no
	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	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<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) 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) 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) 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	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
<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	yes

	evidence sufficient to substantiate the allegation?	
<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.)	yes
<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).	na
<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	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
<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</b>	



	<b>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.)	na
<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.)	na
<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.)	yes

<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.)	yes
<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.)	yes
<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	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
<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.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<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</b>	<b>Audit contents and findings</b>	

<b>(f)</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