

PREA Facility Audit Report: Final

Name of Facility: William G. Truesdale Adult Detention Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/05/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Sharon R. Shaver	Date of Signature: 08/05/2024

AUDITOR INFORMATION	
Auditor name:	Shaver, Sharon
Email:	sharonrshaver@gmail.com
Start Date of On-Site Audit:	06/17/2024
End Date of On-Site Audit:	06/19/2024

FACILITY INFORMATION	
Facility name:	William G. Truesdale Adult Detention Center
Facility physical address:	2001 Mill Road, Alexandria, Virginia - 22314
Facility mailing address:	

Primary Contact

Name:	LaTanya Ervin
Email Address:	latanya.ervin@alexandriava.gov
Telephone Number:	703-745-5075

Warden/Jail Administrator/Sheriff/Director	
Name:	Daniel Gordon
Email Address:	daniel.gordon@alexandriava.gov
Telephone Number:	703-746-5026

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

Facility Health Service Administrator On-site	
Name:	Angela Drake
Email Address:	angela.drake@alexandriava.gov
Telephone Number:	703-746-5100

Facility Characteristics	
Designed facility capacity:	340
Current population of facility:	299
Average daily population for the past 12 months:	298
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males

Age range of population:	18-60+
Facility security levels/inmate custody levels:	minimum, medium and maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	180
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	38
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	127

AGENCY INFORMATION

Name of agency:	Alexandria Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	2003 Mill Road, Alexandria, Virginia - 22314
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:

Name:	Sean Casey, Sheriff
Email Address:	sean.casey@alexandriava.gov
Telephone Number:	703-746-4114

Agency-Wide PREA Coordinator Information

Name:	LaTanya Ervin	Email Address:	latanya.ervin@alexandriava.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:

9

- 115.16 - Inmates with disabilities and inmates who are limited English proficient
- 115.17 - Hiring and promotion decisions
- 115.31 - Employee training
- 115.33 - Inmate education
- 115.34 - Specialized training: Investigations
- 115.42 - Use of screening information
- 115.51 - Inmate reporting
- 115.71 - Criminal and administrative agency investigations
- 115.73 - Reporting to inmates

Number of standards met:

36

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-06-17
2. End date of the onsite portion of the audit:	2024-06-19

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:	Alexandria Sexual Assault Center; Alexandria Department of Community & Human Services (DCHS); LanguageLine; INOVA Fairfax

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	340
15. Average daily population for the past 12 months:	298
16. Number of inmate/resident/detainee housing units:	16
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	291
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:	4
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:	24
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	3
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	84
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:	54

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>6</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>12</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>159</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The population demographics during the site visit included 5-Asian Pacific, 157 Black, 3 Other, 114 White; age ranges included 46 between 18-24, 98 between 25-34, 93 between 35-44, 15 between 45-49, and 24 over 50. Local inmates 15 days, Federal inmates 81 days and State inmates 22 days</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>200</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>118</p>

<p>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:</p>	<p>22</p>
<p>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:</p>	<p>No text provided.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>9</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</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>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The auditor selected all targeted interviewees first and then identified their housing units. Once the number of individuals already selected were categorized by their housing units, then the auditor selected the remaining random individuals from each of the housing units according to factors such as age, race, ethnicity, length of time in the facility, programming, and work assignments to ensure a balanced representative number of interviewees from each of the living units.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The Auditor met no barriers to completing interviews or ensuring representation.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>12</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>	

60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
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:	1
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:	1
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:	3
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:	2

<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>3</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>4</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Interviews with staff, reviews of (15) investigative files, and interviews with (3) inmates who reported a PREA allegation confirmed there were no inmates at the facility who met the criteria for this targeted category.</p>

<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>There were no youthful inmates (2-required) at the facility,, only (1) transgender/intersex inmate (2-required), and no inmates who had been placed in segregated housing for risk of sexual victimization (1-required); therefore, the Auditor oversampled inmates with disabilities/LEP, LGB, and inmates who disclosed prior sexual victimization during the risk screening to compensate for the minimum number not being interviewed in the other three categories.</p>
--	---

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>14</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The auditor met no barriers to ensuring representation of staff. The auditor selected staff randomly from the employee list and shift rosters as well as from personal encounters while on the site inspection. All staff selected willingly participated in the interviews with the auditor.</p>

Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	33
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Disciplinary Hearing Officer, Grievance Officer, and ADA Coordinator.
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<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
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	7
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	Behavioral Healthcare Staff
---	-----------------------------

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

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

85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
---	--

86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
--	--

87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
---	--

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 Alexandria Sheriff's Office is a highly professional organization with 205 deputy sheriffs and civilian personnel. The Office is nationally accredited by the Commission on Accreditation for Law Enforcement Agencies, Commission on Accreditation for Corrections, and the National Commission on Correctional Health Care. The Office has been honored by the National Sheriff's Association with the prestigious "Triple Crown Award" for achieving these national accreditations. The Office is Virginia state certified by the Department of Criminal Justice Services and the Department of Corrections, and most recently by the Community Accreditation for Rehabilitation Facilities. The Detention Center Bureau manages the security of the William G. Truesdale Adult Detention Center which houses approximately 300 inmates including local, state and federal prisoners. The Detention Center Bureau is responsible for access to the facility and the safety of inmates, staff and visitors inside. Support Services, including Records Management, Information Technology, and Facility Support, are also part of the Detention Center Bureau. The Detention Center, which opened 1987, is a direct supervision facility with an interactive management style which offers a positive atmosphere for inmates, makes the inmate accountable, and rewards them for positive behavior. The Detention Center houses approximately 300 local, state and federal pre-trial and sentenced inmates. Prior to 1987, the Detention Center was located at a facility that dated to the 1820s. Inmate Services staff coordinate Inmate Resource Fairs where inmates can meet with exhibitors offering legal, employment, health, educational, training, housing and other services and programs that may benefit ex-offenders as they return to the community. To further help returning citizens, the Sheriff's Office is a member of the Alexandria Reentry Council which encourages community involvement and conducts workshops for families, area businesses, and other

concerned groups. Program offerings include guest speakers with motivational messages; educational initiatives like GED preparation and ESL (English as a Second Language); training to receive nationally-recognized certifications in food service, traffic flagging, and general industry and construction safety; education and life skills program for men; LEAD (an education and life skills program for women); and law and leisure library services. Inmates also receive the opportunity to attend and participate in holiday and cultural programs that explore the arts, heritage and diversity. Read about recent programs for Black History Month, Women's History Month, Hispanic Heritage Month and a winter holiday celebration. The Alexandria Sheriff's Office recently transitioned to a new provider to handle inmate communications including phones and tablets. The switch from Securus to Smart Communications began the week of June 24. With the new system, inmates will receive four free 15-minute phone calls, two free digital messages and two free 20-minute video visits each week. Inmates may use a small law library which includes LexisNexis legal research resources. The leisure library has more than 3,000 books, including recent best sellers, reference books, suspense novels, histories, personal improvement titles, and some published in foreign languages. Inmates may select books from carts placed in their housing units for their enjoyment and enrichment. To enhance the safety of inmates and staff, the Sheriff's Office is now using MailGuard® from Smart Communications. This allows inmates to receive personal postal mail through a safe and secure electronic mail service. Effective June 24, 2024, personal mail for inmates will no longer be accepted at the Adult Detention Center. The Sheriff's Office has contracted with Smart Communications to provide inmate privileged communications, including legal mail, for approved registered attorneys. These changes streamline privileged communications between counsel and inmates, improve legal mail distribution,

maintain privacy and ensure the safety and well-being of inmates and staff. Visitation at the Alexandria Adult Detention Center is provided through secure video access through SmartInmate.com. Video visitation is offered seven days a week, including holidays, between 7 a.m. and midnight (eastern time). The population on day one of the audit was 298 (14-female/284-male) and 180 staff. The facility has 16 housing units identified with the following capacities: 1X-6, 1Y-5, 1A-10, 1B-24, 1CD-24, 1EF-23, 2AB-24, 2C-12, 2D-12, 2E-12, 2F-11, 3AB-24, 3CF-48, 4AB-24, 4CF-48, 4G-32. Maximum security inmates are housed in 1X, 1Y, 2C, 2D, 3AB, 4AB; Minimum security inmates are housed in 1B, 1CD, 1EF, 2AB; and 2E, 2F, 3CF, 4CF, 4G house Minimum/Medium. Currently 2E and 2F are dedicated to the female population. The ASO may repurpose the mission of housing units if there are drastic changes in population types. During the site visit the Auditor toured all four floors and observed all housing units consisting of the following locations. The first floor consists of the 1X-Disciplinary Segregation; 2Y-Protective Custody; 1A-Housing/Currently Vacant, 1B-Housing/Male Work Release; 1C-Housing and 1D-Housing/Male General Population; 1F-Housing; Control-1; Medical; Pharmacy; Booking. Booking Area contains 22 cells and can house up to 43 inmates consisting of 3-Single Occupancy Medical Observations Cells, 15-Single Occupancy Cells/General Use; 2-Double Occupancy Cells; and 5-Multiple Occupancy Cells. Second floor consists of 2A-Housing and 2B-Housing/Currently Vacant; 2C-Administrative Segregation; 2D-Housing; 2E-Housing/Female General Population; 2F-Housing/Female Program Unit/Administrative Segregation; Kitchen (under construction); Multi-Purpose Room, Barbershop, and Administrative Offices. The 2nd Floor Mezzanine houses Administrative Offices; Laundry Room; Breakroom; Tactical Operations Room. The third floor consists of 3A-Housing & 3B-Housing/Male and Female

Critical Care Unit; 3CD-Housing/Male General Population; 3EF-Housing/Male General Population; Storage Area; Recreation; Multi-Purpose Room; Law Library. Third floor mezzanine houses the Sergeant's Offices. The fourth floor consists of 4G-Housing/Male Program Unit; 4EF-Housing/Male General Population; 4CD-Housing/Male General Population; 4AB-Housing/Administrative Segregation. Fourth floor mezzanine consists of 4AB-Housing; 4CD-Housing; 4EF-Housing; 4CF-Classroom; Interview Rooms; Administrative Offices. During the site visit the Auditor visited every area of the facility and engaged in casual conversation with deputies, civilian staff, and inmates. All staff and inmates spoke easily and freely with the Auditor, were very respectful, and aware that the PREA audit was underway although it appeared to the Auditor that business was as usual. Formal interviews were held in multiple locations for ease of inmate movement; however, all interviews were conducted in a private location where the conversations were unheard by other inmates or staff. During the site visit the Auditor observed movement, inmate and staff interactions, booking process, inmate work details, and shift changes. Staff maintained high visibility and provided direct and active supervision of inmates and inmate movement was controlled. The facility was exceptionally clean, orderly, and organized in all areas visited. The Auditor's observations concluded that staff at all levels are highly engaged in their duties, take ownership of their jobs, and provide a safe and secure environment at the facility.

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.).

The audit was conducted using the Online Audits System (OAS). Once uploads were finalized by the agency, the auditor began reviewing the PAQ and documents using the PREA Compliance Audit Instrument and the Checklist of Policies, Procedures, and other documents to create a log of additional information to be requested from the facility. A schedule for the onsite portion of the audit was established, and travel arrangements were secured directly by the auditor. As needed, written requests by email were submitted to the facility for additional documents or clarification of the documents provided. All requests for additional information were responded to promptly and comprehensively. Additional correspondence occurred between the auditor and the PREA Coordinator, up to the onsite portion of the audit and then after until the issuance of the final report. A web search of the facility revealed no derogatory information relevant to this audit. No relevant litigation, no DOJ involvement, no federal consent decrees, or local oversight was discovered during the search. Interviews with the PREA Coordinator and the Sheriff confirmed no consent decrees or oversight exists. The auditor reviewed relevant documents provided by the facility, in addition to the Pre-Audit Questionnaire (PAQ) and supporting documents. Using the PREA Compliance Audit Instrument and the Checklist of Documents during the review of the PAQ, a list was prepared for review during the onsite portion of the audit. Other documents reviewed for compliance determination will be referenced in the narrative sections under each individual standard discussion.

Throughout the audit, an extensive document review was conducted. Various policies, forms, contracts, and additional working documents were reviewed, evaluated, and triangulated against information obtained from interviews and personal observations during the site visit, which were instrumental in determining agency and facility compliance

with the PREA Standards. Included below is the list of governing ASO policies that were provided for compliance determination and will be referenced throughout the audit report, annotated throughout the report using only the policy number. This list is not intended to be exhaustive but outlines the core policy documents used in the evaluation process. Information obtained from these policies combined with the information provided with the PAQ and the observations, facility documentation, and general information collected from the site visit was carefully evaluated and assessed against each of the elements of the standards. Support documentation and text throughout this report includes the following references to the facility Alexandria Sheriff's Office (ASO), Sheriff's Office, Adult Detention Center, and William G. Truesdale Adult Detention Center. All terms are interchangeable and represent the same entity.

- ADM-20-24-02 - Alexandria Sheriff's Office - Prison Rape Elimination Act Policy
- Agency/Facility Organizational Chart
- PREA Coordinator Job Description
- 31.01 Post Order Policy
- Facility Staffing Plan
- Facility Staffing Plan Review
- Daily Activity Reports - Deviation Documentation
- Memo - Common Deviation Reasons
- Post Orders - Confinement Sergeant
- Security & Observation Logs
- Demographic Age Report
- 22.14 Youthful Offenders Policy
- Control Tactics - Full Body Search Lesson Plan
- Guidance on Cross gender searches
- Cross gender training roster
- VisitAble 2023 Disability Awareness & Inclusion Outline and Training Certificates
- MOU & Contract Language Line Services
- UbiDuo usage evidence
- Signed PREA Acknowledgment Statements for Deaf and LEP inmates
- PREA Brochures - Multiple Languages
- PREA laminated cards - Multiple Languages

List of Multi-Lingual Staff
Memo: LEP Resources
Signed Staff PREA Screenings/Misconduct Questions & Promotion Considerations
Prior Law Enforcement Reference Check
New Hire Criminal background checks
Rosters of Contractor Background Checks
Rosters of Employee and Contractor 5-Year background checks
Memo: Facility Camera Update
Alexandria PD Commission on Accreditation for Law Enforcement Agencies (CALEA)
OPS-11 Physical Evidence Policy
Criminal Investigation Flow Chart
Website Review
Staff PREA Training Modules
PREA Acknowledgement Statements
Respectful Classification Practices with LGBTI Inmates Curricula
Working with LGBTI Individuals Lesson Plan
PREA Refresher Training Curricula
PREA Refresher Training Completion Roster
Staff PREA Training Modules
PREA Acknowledgement Statements
Memo: Intake Checklist and Initial Training
Inmate Intake Checklists
Completed Orientation Checklist (Comprehensive)
PREA Video Certification Checklist
Arrival List last 12 months
NIC Special Investigator Training Curricula
Specialized Investigator Training Certificates
WellPath Specialized Training Curricula
WellPath Specialized Training Certificates
NIC Medical Training Curricula
NIC Specialized Medical Training Certificates
22.05 Classification Process Policy
Objective Screening Instrument
Reassessment Screening
Mental Health Screenings
Intake Screening-based Housing Case Notes
Individualized Transgender Housing Assessment & Safety Review
Application Review Sheet (Classification Assignments)
22.20 Detention of Foreign Nationals Policy
Inmate Handbook

MOU for Outside Reporting Agency - Alexandria Department of Emergency & Customer Communications
Documentation of Verbal Reports
Outgoing & Incoming Facility-to-Facility Notifications of allegations
Facility Coordinated Response Plan
Memo: No Collective Bargaining Agreements
Completed Retaliation Monitoring Documentation
Case Files
Investigation Outcome notifications to inmates
Termination of Staff Member Documentation
Report to Licensing Board for Terminated Employee
Completed Sexual Abuse Incident Reviews
PREA Definitions
Sexual Abuse Data Collection Spreadsheet
2022 Completed SSV
Sheriff Approved - 2021 & 2022 Annual PREA Report
Annual Report - Website Confirmation

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	4	0	0	0
Staff-on-inmate sexual abuse	8	0	0	0
Total	12	0	12	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	12	0	0	0
Staff-on-inmate sexual harassment	8	0	0	0
Total	20	0	20	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	3	1	0
Staff-on-inmate sexual abuse	0	6	1	1
Total	0	9	2	1

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	1	3	5	4
Staff-on-inmate sexual harassment	0	3	0	4
Total	1	3	5	8

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:	6
--	---

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files) </p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>4</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p> <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 abuse investigation files) </p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>9</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input 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>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	5
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	<p>There were no allegations reported that involved potentially criminal behavior; therefore, the Auditor only reviewed Administrative Investigations. Cases were selected randomly to include abuse and harassment allegations against both staff and inmates. Of the (15) investigative case files reviewed (8) were inmate/inmate and (7) were staff/inmate; (6) were abuse allegations and (11) were harassment allegations. Dispositions included (3) substantiated, (3) unsubstantiated, and (11) unfounded. The (3) substantiated were 1-inmate/inmate harassment and 2-staff/inmate harassment; (3) unsubstantiated were 1-inmate/inmate abuse and 2-inmate/inmate harassment; (11) unfounded were 3-inmate/inmate abuse, 1-inmate/inmate harassment, (2) staff/inmate abuse, and (3) staff/inmate harassment. Investigations were found to be prompt, thorough, and objective and the case files were detailed and well documented.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

- Yes
 No

Non-certified Support Staff

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

- Yes
 No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: Alexandria Sheriff's Office, General Order, ADM-20-24-02 (PREA Policy); Facility/Agency Organizational Chart; Inmate Services & Alternative Programs Division Director Job Description; Site Visit Observations; Interviews</p> <p>115.11(a): ADM-20-24-02 is the established policy related to the Prison Rape Elimination Act of 2003 (Public Law No. 108-79) (PREA). The Alexandria Sheriff's Office (ASO) will ensure proper procedures, training and management of incidents involving sexual abuse. It is the policy of the Alexandria Sheriff's Office to prepare for, respond to, and administratively investigate all alleged incidents involving sexual abuse and sexual harassment in accordance with the Prison Rape Elimination Act of 2003 (PREA). The Alexandria Sheriff's Office has a zero-tolerance policy towards all forms of sexual abuse and sexual harassment within its facility. All staff, contractors, and volunteers shall take the appropriate steps as outlined in this policy in preventing, detecting, and responding to such conduct.</p> <p>115.11(b): The Sheriff has designated an agency-wide PREA coordinator to work in</p>

	<p>the Inmate Services and Alternative Programs Division and reports directly to the Undersheriff. The coordinator is responsible for developing, implementing, and overseeing the ASO efforts to comply with the PREA standards. In addition, the PREA coordinator is afforded the time and authority to complete her duties. The Auditor reviewed the Inmate Services & Alternative Programs Division Director Job Description and verified that duties include PREA compliance assurance and process management for the mandatory Department of Justice PREA Audits. Interview with the facility PREA Coordinator revealed her efforts touch every aspect of the facility and include the development and revising ASO ADM 20 PREA policy. She is responsible for developing, facilitating, and updating the ASO PREA training curriculum for ASO staff, contractors and volunteers. In addition, she is responsible for the oversight of the facility's coordinated response efforts to include and ensure mental health referrals, retaliation monitoring, reassessments, notification of investigation results, developing and maintaining MOU's w/facility partners for SART, emotional support services and external reporting. Her purview includes maintaining the statistical data, developing the annual report, conducting staffing reviews, incident reviews for sexual abuse allegations, providing recommendations and policy revisions and training refresher. When asked what actions are taken when identifying a compliance issue, she stated she outlines and advises the facility's Command staff and explains the intent behind the standard so they can work collaboratively to identify a solution. In her role as Director of Inmate Services she is able to meet directly with the Chief Deputies of the affected bureaus. Interviews with the PREA Coordinator, Undersheriff, Chief, and Sheriff conveyed full commitment to PREA standards compliance and maintaining sexual safety in the jail.</p> <p>115.11(c): The agency does not operate more than one facility, therefore the designated PREA Coordinator ensures the facility's efforts to comply with the PREA standards.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Site Visit Observations; Interviews</p> <p>115.12(a)(b): ASO has not entered into or renewed a contract for the confinement of inmates, therefore the facility meets compliance with this standard through non-applicability.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); 31.01 Post Order Policy; Facility Staffing Plan; Staffing Plan Review; Daily Activity Reports (Deviations); Memo: Reasons for Deviations; Confinement Sergeant Post Orders; Security and Observations Logs; Upper-Level Staff Unannounced Rounds; Division Commander Monthly Status Reports; Site Visit Observations; Interviews; Onsite-CAP memo;</p> <p>115.13(a): ADM-20-24-02 states, in the process of creating and revising a staffing plan to provide for adequate levels of staffing and video monitoring to protect inmates against sexual abuse, the Sheriff's Office shall ensure that the following factors are taken into consideration: Generally accepted detention and correctional practices; Any judicial, investigative, or oversight findings of inadequacy; All components of the facility's physical plant; The composition of the inmate population; The number and placement of supervisory staff; Programs occurring on a particular shift; Any applicable state or local laws, regulations, or standards; The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and Any other relevant factors. During the initial review of the staffing plan, the Auditor found that the staffing plan mentioned video monitoring but did not provide specific information. Additionally, the staffing plan did not include mention of: Generally accepted detention and correctional practices; judicial findings of inadequacy; findings of inadequacy from Federal investigative agencies; findings of inadequacy from internal or external oversight bodies; All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated); The institution programs occurring on a particular shift; Any applicable State or local laws, regulations, or standards. After a phone interview, the PREA Coordinator composed a memo to the Auditor on 6/20/24 providing clarification and stating the findings of inadequacies (Judicial; Investigative Agencies; internal/external oversight bodies) were non-applicable to the facility. The memo further states that ASO is accredited by the American Correctional Association (ACA) to include compliance with the PREA staffing plan. The facility indicated the standards are referenced throughout policy ADM-20 and displayed in the facility's daily activities which was also confirmed by the Auditor's review of the policy and during the site inspection. The facility provided a detailed description of their camera system, as well as in-depth master camera layout and core programming schedule. The ASO camera system is comprised of 435 camera streams. Cameras monitor hallways, landings, elevators, housing units, classrooms, gym, kitchen, laundry, barbershop, sally port, loading dock and some individual cells. Upgrades included replacing 138 analog cameras with high-definition IP (internet protocol) cameras. The cameras are utilized to augment security in all areas of the facility. The placement and design of the cameras assist with alleviating "blind spots" and ensuring the safety of the inmate population. During the site review, the Auditor observed direct supervision practices during the site visit for both day and evening shifts. The main control deputy observed entryways and movement throughout the facility. All movement was controlled and orderly. All housing units had</p>

at least one deputy and the larger units two in order to maintain visual of the whole unit between the two deputies. Otherwise, the auditor observed no blind spots. From the top range every area of the unit can be observed. The auditor found staffing to be consistent with the approved staffing plan. There were male and female deputies assigned for day and night shifts. Additionally, the building was constructed with windows to view the housing units from upper crosswalks which provides supervisors the ability to observe operations unannounced. The staffing plan was predicated on 340 inmates, with an average daily population of 330 inmates.

115.13(b): In circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan in their Daily Activity Reports. The facility provided samples of daily activity reports from various posts and shifts for dates requested by the Auditor, and the Auditor determined that deviations are documented accordingly.

115.13(c): ADM-20-24-02 states, at least once every year, and in collaboration with the PREA coordinator, the Sheriff's Office chief deputy of security or designee shall conduct an assessment to determine whether adjustments are needed to the staffing plan, the deployment of video monitoring systems, and other technologies, and the resources the facility has available to commit to ensure adherence to the staffing plan. This report will be created by the PREA coordinator and presented to senior command staff for consideration. The facility provided the 2023 and 2024 staffing plan reviews, and the Auditor determined the facility conducts annual reviews of their staffing plan. Interviews with the Sheriff, Chief, and PREA Coordinator further confirmed the facility conducts an annual review of the established staffing plan.

115.13(d): Supervisors shall conduct and document unannounced rounds covering all shifts, and all areas of the facility, to identify and deter staff sexual abuse and sexual harassment. The Sheriff's Office policy prohibits staff members who are aware of these rounds from alerting other staff as to when or where these rounds are occurring, unless related to the legitimate operational needs of the facility. Staff members who alert others about unannounced rounds with the intent to obstruct a supervisor's ability to monitor or protect inmates against sexual misconduct may be disciplined up to and including termination of employment. Supervisors must take immediate action once becoming aware this behavior is occurring. The on-duty supervisors shall determine how and when the unannounced rounds will be conducted and shall review all documentation from the rounds. These unannounced rounds will be documented on the Security and Observation Log (F SHR-0021). This documentation will consist of the date and time along with the name of supervisor conducting the unannounced round. (see Detention Center Standard Operating Procedure 25.09 "Inmate Observation"). The facility provided (41) samples of intermediate-level unannounced rounds logs for dates requested by the Auditor between the period of May 1, 2023 through June 19, 2024, as well as (4) Division Commander Monthly Status Reports between November 2023-March 2024 to verify that upper-level unannounced rounds are conducted as required and all shifts. Based on an interview with the PREA Coordinator and Chief, Captains and above are considered upper-level staff. Unannounced rounds are documented as a "walkthrough" on the Captains' monthly status reports to the Sheriff. Additionally,

	<p>interviews were conducted with (1) Captain and (1) Watch Commander/Lieutenant confirming that they conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment on all shifts and these rounds are documented.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); 22.14 Youthful Offenders Policy; Demographic Age Report; Site Visit Observations; Interviews</p> <p>115.14: ADM-20-24-02 states a youthful inmate (defined as any person under the age of 18 who is under adult court supervision and incarcerated or detained in jail) shall not be placed in a housing unit in which they will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. General population housing for youthful inmates shall be in 1A. Multiple youthful inmates of the same sex may be housed within 1A simultaneously. If circumstances dictate the housing of multiple youthful inmates that warrant "keep separates" or the number of youthful inmates exceeds 11, the Classification manager or designee will review the current housing to determine if an alternative housing unit is available. If there is no other housing available, we will seek assistance from a facility capable of housing the youthful inmates. Signage stating, "NO INMATES BEYOND THIS POINT" shall be posted at the perimeter of the housing unit furthest from the unit housing the youthful inmate. In areas outside of housing units, the Sheriff's Office shall either: Maintain sight and sound separation between youthful inmates and adult inmates or provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact. The Sheriff's Office shall make every effort to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, the agency shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible. The facility has developed policy to direct PREA compliant procedures for management of youthful offenders; however, the facility has not housed youthful inmates during the audit period and are found compliant through non-applicability.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.15	Limits to cross-gender viewing and searches
---------------	--

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed: ADM-20-24-02 (PREA Policy); Security & Observation Logs; Control Tactics - Full Body Search Lesson Plan; List of Cells with Toilet View/Pixilation; Guidance on Cross gender searches; Cross gender training roster; Site Visit Observations; Interviews

115.15(a)(b)(c): ADM-20-24-02 states the Sheriff's Office shall not conduct cross-gender strip searches (meaning a search that requires a person to remove or arrange clothing so as to permit a visual inspection of their breasts, buttocks, or genitalia) or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. Additionally, this policy establishes that the Sheriff's Office shall not permit cross-gender pat-down searches (a running of the hands over the clothed body of an inmate by a male employee) of female inmates, absent exigent circumstances. The agency shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. The Sheriff's Office shall document all cross-gender strip searches and body cavity searches of inmates and all cross-gender pat-down searches of female inmates when it is deemed necessary to perform such searches in exigent circumstances. In these circumstances an Incident Report (F-SHR-0007) will be generated and forwarded to the captain of security and the PREA coordinator.

Based on an interview with the Health Services Administrator (HSA), contract medical staff will not perform body cavity searches. Should a body cavity search be required, the individual will be transported to the hospital and the search conducted in an area that protects the privacy of the inmate searched. The facility houses both male and female inmates. During the audit period there were no opposite gender strip searches. During the audit period, there were no pat-down searches of female inmates that were conducted by male staff. Interviews with (14) random staff and (3) security supervisors confirmed that no opposite gender strip searches ever occur, and that female staff are always available to conduct searches of female inmates. Interviews conducted with (6) female inmates confirmed non had been restricted from access to programs or out-of-cell opportunities based on female staff not being available to conduct a pat search. Based on interviews with the intake officer and PREA Coordinator, and personal observations during the site visit, before any searches are conducted and while in the sally-port, each inmate is asked the questions from the Gender Identify and Search Request Form. Once the inmate specifies their gender identity, then the corresponding gender staff will proceed with the search. The Auditor observed no opposite gender searches. The Auditor observed intake where inmates were asked their gender identity and the corresponding gender completed the search (pat, unclothed, body scanner).

115.15(d): ADM-20-24-02 states the Sheriff's Office shall enable 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. Housing unit deputies will make a gender announcement at the beginning of each shift and document the announcement on the Security and Observation Log (F-SHR-0021). Sheriff's Office civilian staff, contractors and volunteers will make a gender announcement each time they enter a housing unit. No staff member may monitor a camera that is likely to view inmates of the opposite gender while they are showering, performing bodily functions, or changing clothing. During the review of Security & Observation Logs, the Auditor observed the forms include a checklist indicating "staff knock and announce" indicating this is done at the beginning of the opposite gender staff member's shift. Interviews with (14) random staff and (3) security supervisors confirmed that they knock and announce their presence when they enter a unit of the opposite gender and document these announcements on the Security & Observation Log. Interviews with (31) inmates confirmed they are able to shower, use the restroom, and change clothes without being viewed by opposite gender staff. Of the (31) inmates interviewed, (29) stated the opposite gender announcements were made regularly and (2) stated they are made most of the time.

115.15(e): ADM-20-24-02 states transgendered inmates will be searched according to the preference noted on the Gender Identity and Search Request Form (F-SHR-0534) except in exigent circumstances. The preference noted on the form applies to all searches and may change throughout the course of the transgendered inmate's incarceration. No staff member shall conduct a search of a transgender or intersex inmate solely for the purpose of determining genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. Interviews with (14) random staff and (3) security supervisors confirmed their knowledge of the prohibition for searching a transgender or intersex inmate solely for the purpose of determining that inmate's genital status. Additionally, an interview with the (1) transgender inmate at the facility confirmed that an unclothed body search had never been conducted for the purpose of verifying the inmate's sex.

115.15(f): ADM-20-24-02 states security staff shall be trained in how to conduct cross-gender pat down searches, and 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. The Auditor reviewed the *Northern Virginia Criminal Justice Training Academy Control Tactics: Full Body Search Course Curricula* and verified the course meets the training requirements of this standard. The facility indicated on the PAQ that 97% of staff received the required training and provided a 2023 roster for *PREA - Cross and Transgender Searches indicating* (214) staff completions. The 3% who had not completed the course had not completed the training academy at the time the PAQ was completed. As of the site visit, the PREA Coordinator and Training Coordinator confirmed all sworn staff have completed this training.

All camera views were observed by the auditor, and none viewed into showers or toilet areas, or inmate cells. However, the facility has cells designated for self-injurious behavior observations. These cells have cameras and the toilet areas have

	<p>been blurred so that the inmate’s private parts are indistinguishable. The Auditor observed two cameras installed in the designated area where unclothed body searches are conducted. Both the Chief and Sheriff were interviewed concerning these cameras. These cameras were installed due to use of force incidents and contraband entering the facility. The purpose is to minimize inmates refusing to cooperate due to the presence of an obvious camera. Due to the sensitivity of the recordings, the Sheriff has mandated that the footage recorded b these cameras be tightly controlled and accessible to only those in IPO (investigations) who have a legitimate need to view the footage related to an investigation. Additional electronic controls with two-step validation are in place to avoid unauthorized access to the footage created by these cameras. An interview with the IT administrator revealed there is a two-step validation process that a user must go through in order to recorded footage and that the Sheriff has to authorize who can have access to this system. There is no live view capability, only recorded footage. The auditor determined this to meet the requirements of 115.15.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

<p>115.16</p>	<p>Inmates with disabilities and inmates who are limited English proficient</p>
	<p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); VisitAble 2023 Disability Awareness & Inclusion Outline and Training Certificates; MOU & Contract Language Line Services; UbiDuo usage evidence; Signed PREA Acknowledgment Statements for Deaf and LEP inmates; PREA Brochures (English/Spanish/French/Arabic/Russian/Chinese Languages); PREA laminated cards - Multiple Languages; List of Multi-Lingual Staff; Memo: LEP Resources; Site Visit Observations; Interviews</p> <p>115.16(a): ADM-20-24-2 states the Sheriff's Office shall take appropriate steps to ensure that inmates with disabilities have an equal opportunity to benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include providing access to qualified interpreters who can interpret effectively, accurately, and impartially when necessary to ensure effective communication with inmates who are deaf or hard of hearing. In addition, the Sheriff's Office shall ensure that written materials are provided in formats and through methods that ensure effective communication with inmates with disabilities. ASO classification staff provide one-on-one orientations with each inmate committed to the ASO. Depending on an inmate's circumstances the counselor may read the material to the inmate or use one of the communication devices noted below. Resources staff use to communicate with inmates with disabilities include: ASL translation on comprehensive education video; UbiDuo (a wireless communication</p>

device that facilitates simultaneous face-to-face communication using two displays and two keyboards), often used by non-ASL users when they need to speak with the deaf and hard of hearing individuals; IPAD ASL translators; Magnifier Readers; Audio Recordings. The facility provided the Auditor with a sample UbiDuo transcript. An interview with the Sheriff also verified the agency's commitment to the established procedures to provided inmates disabilities equal opportunity to participate in and benefit from all aspects of the PREA program. He explained the various resources that are available to staff to ensure meaningful communication is facilitated with inmates. The facility also provided certificates for (9) classification staff for VisitAble 2023 Disability Awareness & Inclusion Course. This course curriculum prepares staff to interact professionally and appropriately with persons with disabilities. The facility provided samples of documented accommodation documented to complete the intake/classification process for provided for (4) disabled inmates. The auditor interviewed (1) inmate with a hearing disability and (1) with a visual disability who both confirmed that they were provided the PREA program information in a manner they easily understood.

115.16(b): ADM 20-24-2 states the Sheriff's Office shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who have limited English proficiency, including providing interpreters who can interpret effectively, accurately, and impartially. The Auditor reviewed PREA brochures in multiple languages and the facility provided laminated cards, provided to LEP inmates, for requesting services, including "I would like to make a PREA complaint." Additionally, the facility provided an abundance of written evidence confirming 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: Language Line usage documentation for multiple services, including risk screening and classification communications; signed PREA acknowledgments for LEP inmates in Spanish, French, Arabic, Russian, Chinese; Orientation Checklists; transcripts of verbal conversations between staff and inmates. Site Visit Observations: The Auditor used the facility's contracted service with Language Line to interview (3) LEP inmates. Use of the service allowed for quickly accessing interpreters for French, Haitian-Creole, and Spanish languages. Instructions for staff to use Language Line were located at the booking desk, Watch Commander's office, and control room. Instructions were easy to follow. The facility provided samples of documented use of language line to complete the intake/classification process with (6) inmates. Interviews with the (3) LEP inmates confirmed they were provided the PREA information in their first language through use of the interpreting line and were also given the written information translated into their language. Interviews with (14) random staff and (3) security supervisors confirmed their awareness of the Language Line services available but stated they mostly use Google translate for daily interactions when needed. Additionally, they were aware of the list of multilingual staff maintained in the control room who may assist with communicating with inmates when needed. An interview with the Sheriff also confirmed the use of Google translate and staff interpreters as needed, although he stated the contract provider should be used for more sensitive interactions such as conducting screenings or investigating a PREA allegation. Additionally, the ASO

handbooks, PREA brochures and PREA signage are readily available in English and Spanish. These documents have been translated into French, Arabic, Russian and Chinese for use when needed. The translated version of the documents is maintained on the Main Bulletin for staff easy access. LEP inmates that speak languages other than Spanish are given laminated cards to ensure their access to emergency or basic needs such as a phone call, medical or to speak with classification.

115.16(c): The Sheriff's Office shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise an inmate's safety, the performance of first-responder duties, or the investigation of an inmate's allegations. The facility indicated no instances where an inmate interpreter was used. Interviews with (14) random staff and (3) security supervisors confirmed that other inmates are not used as interpreters, readers, or other types of assistants except in exigent circumstances. They were unaware of any situation that inmates had been used for this purpose within the past 12 months. The PREA Coordinator explained that anytime there is an incident or allegation of sexual abuse or harassment the first responder will document the interaction in an incident report and that report would include if an interpreter was necessary.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. Additionally, the facility exceeds provisions (a) and (b) by: (a) providing classification staff with additional Disability Awareness & Inclusion training; and (b) providing laminated cards in various languages for inmates to report a PREA allegation.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Signed Staff PREA Screening Forms for Misconduct Questions & Promotion Considerations; Prior Law Enforcement Reference Check; New Hire Criminal Background Checks; Rosters of Contractor Background Checks; Rosters of Employee and Contractor 5-Year background checks; Site Visit Observations; Interviews</p> <p>115.17(a)(f)(g): ADM-20-24-02 states the Sheriff's Office shall not hire or promote anyone who may have contact with inmates, or retain the 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; or Has been convicted of, or civilly or administratively adjudicated for, engaging, or attempting to engage in sexual activity in the community facilitated by force, threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse. The Sheriff's Office shall impose on its current employees a continuing</p>

affirmative duty to disclose any of the misconduct described in this section. The ASO Employee PREA Screening Form includes signature-required verification questions relating to the misconduct questions outlined in this provision. The auditor reviewed personnel files of (13) employees hired within the 12 months prior to the audit and (2) employees promoted during the audit period and found completed and signed PREA Screening Forms indicating that during the application process each individual was directly asked about misconduct as outlined in provision (a) of this standard. The Auditor interviewed (2) members of the Human Resources Team who explained that each candidate is required to complete the ASO Employee PREA Screening Form before proceeding with the hiring process. Any candidate that is found to have engaged in the outlined misconduct is ineligible for employment consideration.

115.17(b)(c)(d)(h): ADM-20-24-02 establishes that the Sheriff's Office shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to retain the services of any contractor, who may have contact with inmates. Before hiring a new employee or enlisting the services of any contractor, who may have contact with inmates, the Sheriff's Office shall: perform a criminal background records check; and make every effort 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. Unless prohibited by law, the Sheriff's Office shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a signed consent form and request from an institutional employer for whom such employee has applied to work. The facility provided (2) examples of employee reference checks verifying that any derogatory histories are investigated and considered prior to employment with the ASO. Additionally, the facility provided (1) *Prior Law Enforcement Personnel Records Request* showing the facility does 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. The facility indicated that (49) individuals (32 staff and 17 contractors) had criminal background checks conducted. For staff, the employee applicant summary includes a detailed description of the applicant's driver history, and state (VCIN) and federal (NCIC) criminal background checks. The Auditor reviewed personnel files for (13) staff, and (8) contractors confirming that all had a criminal background check conducted prior to hire. Interviews with (2) members of the Human Resources Team confirmed that background records checks are completed on all employees and contractors; additionally, background investigations are completed on all sworn staff. They also explained that incidents of sexual harassment will be considered in determining whether to hire or promote a candidate on a case-by-case basis. The background investigation includes contacting former employers and obtaining information on any investigations that occurred during the applicant's employment as well as the information about the candidate's departure from employment.

115.17(e): ADM-20-24-02 states the Sheriff's Office shall conduct criminal background records checks every two years on current employees, and contractors. These background checks are conducted by the Investigations, Policy & Oversight Section. The volunteer coordinator will conduct criminal background checks every six months on volunteers who may have contact with inmates. The Sheriff's Office shall ask all

	<p>applicants and employees who may have direct contact with inmates about previous misconduct described in this section, in: Written applications and/or interviews for hiring or promotion; and Interviews or written self-evaluations conducted as part of reviews of current employees. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. The Auditor's review of (13) personnel files found that employees are advised that material omissions or presenting materially false information is grounds for termination. The facility provided evidence (employee audit) from February 1, 2023, verifying all staff receive an updated criminal background and driver's history, every two years. Additionally, the facility provided evidence that the last contractor checks were conducted in September 2023. The facility also provided background check clearance for (3) volunteers. The facility exceeds the 5-year criminal background check requirement by conducting checks every (2) years.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. Additionally, the facility exceeds provision (e) by conducting criminal background checks for all employees every two years.</p>
--	--

115.18 Upgrades to facilities and technologies	
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Modifications to Kitchen; Memo: Facility Camera Upgrade; Site Visit Observations; Interviews</p> <p>115.18(a): The facility is currently undergoing substantial modifications with a major construction project in the kitchen. The facility provided a detailed description of the modifications and how these modifications impact PREA prevention efforts. The final approved design provides a more open kitchen workspace. The plan eliminates the pot and pan wash station from being enclosed, thus eliminating any visual obstructions. Additionally, a window was added to the dry storage area and insulated glass doors have been designed for the freezers, to improve visual accountability. The Auditor confirmed during the PREA Coordinator's interview that she was included in the design planning to provide input related to PREA compliance issues and is involved in monitoring the construction progress. During an interview with the Sheriff, he explained that the PREA Coordinator has direct input and involvement on all expansions or modifications of the facility and that consideration is given on the effect the design or modifications have upon the agency's ability to protect inmates from sexual abuse.</p> <p>115.18(b): The facility provided a detailed description of the camera system, as well as in-depth master camera layout and core programming schedule. The ASO camera system is comprised of 435 camera streams. Cameras monitor hallways, landings,</p>

	<p>elevators, housing units, classrooms, gym, kitchen, laundry, barbershop, sally port, loading dock and some individual cells. The facility had a substantial upgrade to the camera system which began in 2020 and was completed in 2022. Upgrades included replacing 138 analog cameras with high-definition IP cameras. The cameras are utilized to augment security in all areas of the facility to enhance the facility's ability to protect inmates from sexual abuse. The placement and design of the cameras assist with alleviating "blind spots" and ensuring the safety of the inmate population.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); MOU with Alexandria Department of Community and Human Services (DCHS); Sexual Assault Response Team (SART) Cooperative Agreement with ASO and INOVA Fairfax Forensics Team, Alexandria DCHS, Alexandria Victim-Witness Assistance Program, Alexandria Office of the Commonwealth's Attorney and the Alexandria Sheriff's Department; Alexandria Police Department Commission on Accreditation for Law Enforcement Agencies (CALEA) Certification Notice; OPS-11 Physical Evidence Policy; Criminal Investigation Flow Chart; Site Visit Observations; Interviews</p> <p>115.21(a)(b): ADM-20-24-02 establishes that the ASO will ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. To the extent the ASO provides support to APO in investigating allegations of sexual abuse, it shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions, and in accordance with General Order OPS-11 "Physical Evidence". The Alexandria Police Department is governed by the Commission on Accreditation for Law Enforcement Agencies (CALEA) which governs evidence protocols for public safety organizations. ADM-20-24-02 establishes that allegations of sexual abuse, other than sexual battery, will be referred to the Alexandria Police Department for investigation by the Administrative Services Bureau (ASB) captain pursuant to the Alexandria SART Cooperative Agreement, which was also verified by review of the Auditor. APD will be the primary investigating agency as outlined in the SART Cooperative Agreement. The ASO Investigations, Policy & Oversight Section will cooperate fully with APD and provide any necessary support or assistance requested. The policy further establishes that allegations of misdemeanor sexual battery of an inmate will be documented and referred to the Investigations, Policy & Oversight Section for criminal investigation. Evidence collection conducted by APO is conducted according to CALEA standards and in accordance with ASO General Order OPS-11-18-03, which is a uniform evidence protocol consistent with the</p>

DOJ's Office of Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents" protocols. Review of the SART Cooperative Agreement also confirms that all parties to the agreement will follow the established evidence protocols. An interview with the PREA Coordinator confirmed that ASO is responsible for conducting criminal investigations of misdemeanor sexual battery and felony sexual battery allegations are investigated by the Alexandria Police Department.

115.21(c): ADM-20-24-02 establishes that pursuant to ASO's participation in the SART Cooperative Agreement, all victims of sexual abuse will have access to forensic medical examinations, without financial cost to the victim, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs), where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. Forensic medical exams are offered at INOVA Fairfax hospital. INOVA is a part of the City of Alexandria's SART. The Sheriff's Office shall document its efforts to provide SAFEs or SANEs for this purpose. The Auditor verified that SAFE/SANE services are available through review of the SART Cooperative Agreement and conversation with a representative from the INOVA Fairfax hospital. During interviews with the PREA Coordinator and HSA, the facility had no allegations within the audit period requiring a SANE examination; however, if an inmate required an exam it would be documented in an incident report.

115.21(d)(e)(h): ADM-20-24-02 establishes that the ASO has entered into an agreement with the Department of Community and Human Services Sexual Assault Center (SAC) and Domestic Violence Program to make available to the victim an advocate from the sexual assault center. As a part of the Alexandria City SART agreement, the Department of Community and Human Services agrees to provide advocates 24 hours a day 365 days a year for emergency response to law enforcement and medical forensic exams and provide professional and sensitive companion services to victims. Through an MOU with DCHS for emotional support services, the facility will arrange an advocate in the event of an incident, and victim advocates are available through the inmate phone system. When requested by the victim, the SAC victim advocate staff member shall accompany the victim throughout the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. Inmates can contact the Alexandria Sexual Assault Hotline free of charge from the inmate phones - calls are not recorded or monitored nor do inmates need to use their inmate pin to access this service. During interviews with the PREA Coordinator and ASO Lead Investigator the auditor verified that a victim advocate will be offered and provided to victims of sexual abuse who will accompany and provide emotional support, crisis intervention, information and referrals during the forensic medical examination process and investigatory interviews. The Auditor reviewed the MOU and spoke with a Rape Crisis Counselor at the DCHS and confirmed that their agency will provide crisis intervention counseling, advocacy, emotional support services related to sexual abuse/harassment, information, and make referrals for victims of sexual violence who are detained in the William G. Truesdale Adult Detention Center. Additionally, their

	<p>counselors will provide 24-hour accompaniment support for SANE exams and legal advocacy referrals.</p> <p>115.21(f): The ASO provided an email as evidence that the APD will follow the requirements of 115.21 (a) through (e) during investigations, which is also supported and evidenced by the SART Cooperative Agreement.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Investigations Spreadsheet (All); Sample of Case Files (10); Cooperative Agreement with ASO and INOVA Fairfax Forensics Team, Alexandria Department of Community and Human Services (DCHS), Alexandria Victim-Witness Assistance Program, Alexandria Office of the Commonwealth's Attorney and the Alexandria Sheriff's Department; Website Review; Site Visit Observations; Interviews</p> <p>115.22(a)(b)(d): ADM-20-24-02 establishes that the Alexandria Sheriff's Office will ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The ASO conducts its own administrative investigations into allegations of sexual abuse and sexual harassment. The Alexandria Police Department (APD) is responsible for conducting felony sexual abuse investigations for the Alexandria Sheriff's Office. All referrals will be documented. In the past 12 months, ASO reported on the PAQ (32) allegations of sexual abuse and sexual harassment that were investigated administratively, and none were referred for criminal investigation. The Auditor reviewed the PREA Coordinator's detailed tracking spreadsheet for all allegations and selected (14) random case files for review from the (32) listed. Based on the sample case files reviewed and interviews with the PREA Coordinator and ASO Lead Investigator, the Auditor determined that all allegations were forwarded to the appropriate entity for investigation. The Auditor interviewed the ASO Lead Investigator who explained that felony allegations of sexual abuse are referred to the APD and that the ASO investigates misdemeanor sexual abuse. The Auditor's review of the public website found that the ASO has posted a recap of their policy to ensure allegations of sexual abuse and sexual harassment are referred for investigations to an agency with the legal authority to conduct criminal investigations. The Auditor's interview with the Sheriff concluded that the ASO IPO/Investigations Unit reviews all allegations and forward any with potentially felony criminal behavior to the APD; otherwise, the ASO IPO/Investigations Unit promptly investigates the allegation.</p> <p>115.22(c): A review of the Cooperative Agreement with ASO and INOVA Fairfax</p>

	<p>Forensics Team, Alexandria DCHS, Alexandria Victim-Witness Assistance Program, and the Alexandria Office of the Commonwealth's Attorney confirmed that the responsibilities of all entities involved in the response are outlined, to include the responsibilities of both the ASO and the investigating entity. The facility reported no criminal investigations were required for the audit reporting period.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Staff PREA Training Modules I, II, III; PREA Acknowledgement Statements; Respectful Classification Practices with LGBTI Inmates Curricula; Safety First: Working with LGBTQ Individuals Lesson Plan; PREA Refresher Training Curricula; PREA Refresher Training Completion Roster; Site Visit Observations; Interviews</p> <p>115.31(a)(c)(d): ADM-20-24-02 states the Alexandria Sheriff's Office is committed to communicating to the inmates at its jail, to its employees, and to contractors and volunteers the following information through the training, education and orientation programs, including; the agency's zero tolerance policy; the agency's policies to prevent, detect, and respond to sexual abuse and sexual harassment; and other rights and obligations under this policy. The Sheriff's Office shall train all employees who may have contact with inmates on: The zero-tolerance policy for sexual abuse, sexual harassment, and retaliation; how to fulfill their responsibilities regarding prevention, detection, reporting, and response to sexual abuse and sexual harassment; inmates' right to be free from sexual abuse and sexual harassment; the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; 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 relationships with inmates; how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. The auditor reviewed the facility's 3-Module Video comprehensive training for staff. The training was found to comprehensively cover all topics required of provision (a). One of the 3 videos delivered to all employees is the Comprehensive Inmate Training Video so that staff have the same information that is provided to the inmates which is above and beyond the requirements of this standard. The video is presented verbally, in closed caption, and sign language. The video is also available in Spanish. The agency documents, through employee signature or electronic verification, that employees understand the</p>

training they have received. The employee training acknowledgment form contains an attestation that confirms understanding of the PREA training topics and related policies, key terms, signs and symptoms; and first responder obligations. The Auditor selected and reviewed samples of training records for (25) employees and identified signed employee-acknowledgment forms confirming their understanding of the training received. Additionally, the facility provided a roster of (184) training completions from 2023 indicating all current employees have received the required training. The established training is delivered upon hire and every two years. In years in which an employee does not receive refresher training, the ASO provides refresher information on current sexual abuse and sexual harassment policies. The facility provided a 2024 ASO Roll Call Policies indicating the schedule that policies are reviewed for the year at roll call. PREA and PREA Annual Refresher is listed in April 2024. The ASO utilizes a computer-based system to administer and track delivery of the required training and the policies that are assigned for review and documents the employees' attendance/review electronically. An interview with the PREA Coordinator learned that the last PREA refresher training was on January 26, 2024. The refresher training was offered through PowerDMS (ASO's training and policy management system) and included a review of the ASO ADM-20 policy, PREA audit process, and frequently asked questions. A roster for this refresher training was provided for the Auditor's review indicating all staff received this refresher training. She further explained that contracted employees are required to complete the same training as ASO employees consistent with standard 115.31 rather than standard 115.32. Interviews with (14) random staff confirmed they received initial training and refresher training as outlined in the ASO policy. These employees were knowledgeable on all topics delineated in provision (a) and understood their responsibilities.

115.31(b): ADM-20-24-02 establishes that ASO security staff shall be trained in how to conduct cross-gender pat down searches, and 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. The policy also establishes that training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. However, the Alexandria Sheriff's Office Detention Center houses both male and female inmates and Gender Responsiveness Training is a part of Module III training as described in the narrative for provision (a) of this standard.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard and exceeds provision (a) by including the comprehensive inmate training video as part of each employee's initial training, providing periodic refreshers about PREA topics throughout the year during roll call, and requiring the same level of training for contracted employees as ASO staff.

115.32	Volunteer and contractor training
---------------	--

	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); PREA Employee Training Curricula; PREA Volunteer Orientation Curricula; Contractor/Volunteer signed PREA Acknowledgements; Site Visit Observations; Interviews</p> <p>115.32(a)(b)(c): ADM-20-24-02 establishes the Sheriff's Office shall ensure that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the Alexandria Sheriff's Office sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of the Sheriff's Office zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. Additionally, WellPath (medical) and Aramark (food service) must complete the same training as prescribed for employees under 115.31. Volunteers receive orientation training annually. The Auditor reviewed the Volunteer Orientation and the PREA Employee Training Modules I, II, III and found they provide the required training for contractors and volunteers as prescribed. The facility reports that (127) Volunteers and (38) Contractors have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. The Auditor selected (3) volunteers and reviewed their signed training certification forms confirming volunteers received the required training and acknowledge understanding of their responsibilities and requirement to comply with the ASO policies. The Auditor reviewed contractor training records as part of 115.31. The Auditor interviewed (1) contracted food service employee confirming he has received the employee training outlined in 115.31 and was also advised that in addition to the comprehensive training received at ASO, he is also required to take periodic PREA training through Aramark. The Auditor interviewed (2) contracted medical staff who also confirmed completing the facility training requirements initially and annually as well as PREA training through WellPath. The Auditor interviewed (4) DCHS mental health staff who confirmed they completed the initial PREA training and annual refreshers as required. An interview with (1) volunteer also confirmed that she has completed the Volunteer Orientation training and understands the ASO zero-tolerance policy and her responsibilities.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.33	Inmate education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

Evidence Reviewed: ADM-20-24-02 (PREA Policy); VisitAble 2023 Disability Awareness & Inclusion Outline and Training Certificates; MOU & Contract Language Line Services; UbiDuo usage evidence; Signed PREA Acknowledgment Statements for Deaf and LEP inmates; Inmate Handbook; PREA Brochures - Multiple Languages; PREA laminated cards - Multiple Languages; List of Multi-Lingual Staff; Memo: LEP Resources; PREA Inmate Education Brochure (Intake); PREA Signage; Victim Support Services Signage; Inmate Intake Checklist Form; Chief Deputy Directive; Memo Subject PREA Standard 115.33; Observations During Site Visit; Interviews.

115.33(a): ADM-20-24-02 establishes that during the intake process, inmates shall receive information explaining the Sheriff's Office zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The facility provided samples of the Intake Checklist for (4) inmates with the PAQ and a memorandum explaining that prior to April 22, 2024 the delivery of the zero-tolerance policy and how to make a report of sexual abuse and sexual harassment was being provided during the classification interview which is completed prior to an inmate being assigned to a housing unit and generally within 24 hours, but not necessarily during the initial intake procedures. To ensure that all incoming inmates receive this information upon arrival, as of April 22, 2024 the facility implemented a procedure that the booking deputy will provide each new arrest inmate the PREA brochure and will document this on the Inmate Intake Checklist Form. The Auditor reviewed the PREA Brochure and found it to contain information about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment.

During the site visit the Auditor observed portions of several inmates during the intake/booking process. Twice the Auditor entered the booking area to observe the booking/intake process observing various portions that were simultaneously being conducted by multiple staff (deputies, medical, classification, and behavioral health); in respect of time and staffing, the Auditor had an intake deputy cover the full intake process as a simulation during a one-on-one interview and so the auditor could understand the parts that were not observed. The deputy also provided the Auditor with the full process in written format. Based on this simulation and excerpts observed by the Auditor, the ASO William G. Truesdale Adult Detention Center Booking Process observes the process as outlined below. Immediately upon entry into Door 7 (Sally Port Area) and prior to search, the deputy will complete a Gender Identity and Search Request Form which includes the Name, Booking Number, Date and asks if the inmate identifies as transgender or intersex, their preferred pronouns, and whether or not a male or female deputy is preferred for searches. The preferred search request will be honored unless there are emergency or exigent circumstances that warrant their immediate search by a deputy not of their gender preference. The arrestee signs and dates the form, followed by the deputy conducting the search. Next they are asked a series of medical/mental health questions after which a Body Scan is conducted using same gender as searches. Medical staff then report to the Sally Port area to conduct the initial medical screening, which will either clear the new arrestee for entry or deny entry. When the new arrestee is cleared by Medical, they are escorted directly to see the Magistrate after which time they are seated on the

bench in the booking area and await the paperwork portion of the Booking Process. The paperwork portion of the Booking Process consists of the following: the new arrestee will be asked a series of questions to determine if they have been into the facility before; all personal and identifiable information is recorded; the new arrestee will be given an explanation on PREA, Sexual Assault, How to Prevent Sexual Assault and Harassment, Zero-Tolerance Policy, How to Report Sexual Abuse and Harassment, and Resources available to them while at the facility; a PREA Brochure is then given to the inmate; the deputy will initial on the Booking Checklist stating PREA Brochure was given to the inmate; once the Booking Process is complete, the inmate is given a chance to use the telephone; the inmate is then placed into one of the booking cells; depending upon how they answered the questions on the Gender Identity and Search Request Form will determine if the inmate will be in a cell alone or with other inmates. The Auditor spoke with the new arrivals and confirmed that they had received the PREA brochure during booking and had possession of the literature in the holding cell. The classification intake process generally takes 72 hours at which time the inmate receives comprehensive PREA education, and a risk screening is conducted by classification staff.

During an interview with the PREA Coordinator and review of the PAQ, the Auditor learned that in the last 12 months (73) inmates were booked and received the required information during intake. the PREA Coordinator explained that prior to the facility's mock audit, which was conducted early 2024, the facility was providing the initial inmate education (issuing the PREA brochure and informing inmates of the zero-tolerance) during the classification intake process which is completed over a 72-hour period. Because their full intake process takes generally 72 hours and the standard's language refers to "during intake" she felt the facility was complying with the intent of the standard. The auditor who conducted the mock audit explained that this standard applies to their intake at commitment when being booked into the jail. In order to correct this matter, the PREA Coordinator developed new procedures and the Chief Deputy of Security directed booking intake staff to begin distribution of the PREA Brochure which outlines ASO's zero-tolerance policy and reporting methods. Delivery of this information is now documented by the booking deputy on the Inmate Intake Checklist during the initial intake/booking. This directive has been in effect since April 22, 2024. Because this procedure was just implemented on April 22, 2024, the Auditor requested additional documentation be provided during the post-audit period to demonstrate the process is institutionalized. The Auditor selected and reviewed education records for (38) inmates who arrived between July 2022 through June 2024. Of these records, (38) indicated the inmate was provided the required intake information within 72 hours (during the facility's intake process). The facility provided a list of inmates and an Intake Checklist for the 204 inmates who were booked into the facility between June 17, 2024 through July 17, 2024 as requested by the Auditor for additional monitoring of their new procedures. The documentation indicated 100% of the inmates (204) received the brochure during booking. Review of this documentation and follow-up interview with the PREA Coordinator concludes that this procedure is well implemented and institutionalized.

115.33(b)(e): ADM-20-24-02 states that within 30 days of intake, the Sheriff's Office

shall provide comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and the agency's policies and procedures for responding to such incidents. ASO's comprehensive inmate education curriculum is adapted from 2023 PREA Resource Center Video for adults and juvenile people in confinement. ASO enhanced the video with a message from the Sheriff prefacing the video with a message explaining the inmate's right to be free from sexual and sexual harassment. The enhancement also includes a closing featuring ASO facility-specific reporting methods; intervention methods; tips for staying safe. ASO has a two-tiered comprehensive education process that occurs within 72 hours of arrival. Within 72 hours of arrival classification staff, during the initial intake interview, provides a PREA orientation where they review the PREA brochures, discuss the inmate's right to be free from sexual abuse and sexual harassment, explain the reporting methods, and explain the emotional support services available. Each inmate is also provided a facility handbook that explains PREA including definitions, inmate rights, and reporting information. Upon classification and clearance to move, inmates are required to watch the comprehensive education video before they can be rehoused from booking. The booking deputies play the video and field any questions. Inmates are required to sign off on the PREA Intake Orientation Checklist to show completion. The Auditor reviewed the ASO's Comprehensive Training Video and found it to be engaging and presenting in a manner that could be widely understood by the viewer. It contained all the topics required in provision (b) and contained facility specific information. The Auditor also reviewed the facility handbook and PREA brochure and found the information consistent, easy to understand, and accurate. Based on the two-tiered comprehensive education process and the process being conducted within 72 hours, the facility exceeds this provision of the standard. The Auditor reviewed records for (38) inmates and found all (38) received comprehensive training within 30 days as required. Because the facility has consistently demonstrated delivery of the comprehensive training within 10 days (37 of 38 reviewed were less than 10 days) the facility exceeds the minimum requirements of this standard.

The Auditor interviewed (2) booking deputies who all confirmed that inmates are provided the PREA brochure at the time of booking and verbally told about the zero-tolerance for sexual abuse and sexual harassment and how to make a report. The Auditor interviewed the Classification Manager and (1) Classification Counselor who explained that they generally meet with a new arrival on their first day for their initial intake interview. Previously this is when they would tell the inmate about PREA and provide a brochure. However, if an inmate arrives outside of regular work hours or over the weekend it could be up to 72 hours before they would meet with them which is why the process was changed for the booking deputy to provide the initial PREA notification to inmates. They further explained that with the new procedures they still cover PREA during their initial meeting with each inmate one-on-one. During this time, the counselor provides a PREA orientation where they review the PREA brochures, discuss the inmate's right to be free from sexual abuse and sexual harassment, explain the reporting methods, and explain the emotional support services available. Each inmate is also provided a facility handbook that explains

PREA including definitions, inmate rights, and reporting information. Once the initial classification has been completed and the inmate is cleared to move to a housing unit, the inmate is required to watch the comprehensive education video before they can be rehoused from booking. The booking deputies play the video and field any questions. Inmates are required to sign off on the PREA Intake Orientation Checklist to show completion.

The Auditor obtained an inmate roster by housing unit from the facility on day one of the site visit. The Auditor also requested a list of all inmates with a disability, inmates who are identified as limited English proficient (LEP), inmates who identify as lesbian, gay, bisexual, transgender, or intersex (LGBTI), inmates who have disclosed prior sexual victimization during risk screening, inmates who have made a report of sexual abuse or sexual harassment at the facility, who have been placed in isolation for being at risk for sexual abuse; and any inmates under the age of 18. The facility provided the requested lists with the following findings: youthful offenders (0); hearing impaired (3); vision impaired (1); physical disability (4); cognitive disability (1); LEP (84); reported prior victimization (159); reported sexual abuse/harassment at the facility (26); LGB (59); TG/IS (5). The facility reported there were no youthful offenders and no inmates held in administrative segregation for risk of sexual victimization. The languages represented by the (84) provided for LEP included Spanish, Chinese, French, and Arabic and all were not all LEP but more appropriately categorized as ESL (English as second language). It should also be noted that the computer-generated lists included inmates who were at the facility within the prior 12 months, not necessarily currently housed at the facility. Based on the Auditor's observations during the site visit, informal conversations with staff and inmates during the site visit, and a review of the demographics noted on the roster, the Auditor found no evidence to contradict the targeted categories listed as none. There were (298) inmates (14-Females/284 Males) assigned to the facility on the first day of the audit and the Auditor selected (5) Females and (16) Males for interviews. The auditor randomly selected (16) inmates (3-Females/14-Males) from various demographics, housing units, age, and length of time at facility for interviews; and randomly selected (15) inmates (2-Females/13-Males) from the targeted categories (1-cognitive disability; 1-visual disability; 1-hearing disability; 1-transgender; 4-reported prior sexual abuse; 3-reported an allegation; 3-LEP; 2-LGB). The auditor utilized questions from the Random Inmate Questionnaire found on the PRC website when conducting these interviews and documented the answers on a modified questionnaire form. Interviews with (31) inmates confirmed they were informed of the zero-tolerance policy and how to report incidents of sexual abuse or harassment during intake while they were in booking either by the booking deputy or the classification counselor. This information was explained to them in a one-on-one setting at the intake desk or in an office (depending on whether the deputy or counselor provided the information) and received the PREA brochure. All inmates were well informed about their rights and responsibilities and knew at least one method to make a report. Additionally, these interviews confirmed that they had all seen the video, received training provided by a classification counselor, was given the opportunity to ask questions, and understood the information provided. Every inmate interviewed was also aware of the outside emotional support services that are

available to them and how to access should they be needed.

115.33(d): ADM-20 states the Sheriff's Office shall take appropriate steps to ensure that inmates with disabilities and/or LEP inmates have an equal opportunity to benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include providing access to qualified interpreters who can interpret effectively, accurately, and impartially when necessary to ensure effective communication with inmates who are deaf or hard of hearing. In addition, the Sheriff's Office shall ensure that written materials are provided in formats and through methods that ensure effective communication with inmates with disabilities. ASO classification staff provide one-on-one orientations with each inmate committed to the ASO. Depending on an inmate's circumstances the counselor may read the material to the inmate or use one of the communication devices noted below. Resources staff use to communicate with inmates with disabilities include: ASL translation on comprehensive education video; UbiDuo - wireless communication device that facilitates simultaneous face-to-face communication using two displays and two keyboards (used by non-ASL users when they need to speak with the deaf and hard of hearing individuals); IPAD ASL translators; Magnifier Readers; Audio Recordings. The initial PREA orientation, intake brochures and zero-tolerance signs have all been translated into Spanish, French, Chinese and Arabic. The PREA video is in English and Spanish as well. The comprehensive PREA educational video has subtitles and ASL translation. In addition, the facility utilizes translators, UbiDuo and other auxiliary aids to communicate and educate deaf inmates. The facility provided for the Auditor's review (9) Disability Training certificates for VisitAble 2023 Disability Awareness & Inclusion and course outline; Language Line contract; and a Sample UbiDuo transcript. The Sheriff's Office provides interpreters who can interpret effectively, accurately, and impartially. The Auditor reviewed PREA brochures in multiple languages and the facility provided laminated cards, provided to LEP inmates, for requesting services, including "I would like to make a PREA complaint." Additionally, the facility provided an abundance of written evidence confirming 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: Language Line usage documentation for multiple services, including risk screening and classification communications; signed PREA acknowledgments for LEP inmates in various languages; Orientation Checklists; Comprehensive Education Certificates; transcripts of verbal conversations between staff and inmates. The Auditor used the facility's contract for Language Line to interview (3) LEP inmates who all confirmed that they received the PREA education in their first language by use of an interpreter and that the written material was also transcribed for their use. An instruction card for accessing the Language Line was provided to the Auditor to make the call to the Language Line which was easy to facilitate; these instructions were observed by the Auditor at the booking desk, main control, and the Watch Commander's office.

115.33(f): ADM-20 states in addition to providing such education, the Alexandria Sheriff's Office shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats. An inmate received from another detention center or mental health facility will be

provided a copy of the ASO Prevention and Reporting brochure that includes the Department of Emergency & Customer Communications phone number. In addition, all inmates shall be provided the comprehensive PREA training as described above for a new intake.

The Auditor observed the zero-tolerance posters and emotional support services posters and telephone signs for free calls to the ASO IPO section or the Department of Customer Communications displayed next to the telephones on each housing unit. These posters were also displayed in other common areas of the facility to include the staff break room. In addition, the zero tolerance and emotional support services posters are uploaded on the inmate tablets. Zero Tolerance posters were observed throughout the entire facility in all work areas, housing units, common areas, staff areas and booking, to include interview rooms. Intake sallyport and facility entrance had signage displayed. Signage is printed in English and Spanish in red and on sturdy material signage permanently affixed. All reporting methods are listed with telephone numbers where available. Additionally, each housing unit phone bank has a supplemental Zero Tolerance poster that provides detailed calling instructions to use the free call speed dial number. The Auditor tested calls to 4444, 1111, 2222, 3333. All calls were successfully completed, and the Auditor made connection with someone at the specified location who explained they would take the information from an inmate and forward it to IPO. Signage was also observed displayed in units that were not currently in use. All information was found to be current and accurate and consistently placed at eye level for that could be read from a reasonable distance. Pamphlets were observed at each booking station in the intake area. All signage observed was found to be readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility. The signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair. The information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage. The Auditor had informal conversations with staff and inmates and found that the signage displayed has always been posted and is easily accessible.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. The facility exceeds provision (b) of this standard based on the PREA training video being provided verbally and in closed-caption and ASL and is available in Spanish; additionally, the two-tiered comprehensive education process provides reinforcement of the PREA program and gives the inmate time to formulate questions that may be discussed at a future meeting with the classification staff. Additionally, the facility demonstrated a clear pattern of providing the comprehensive training within 10 days (normally 72 hours) and the standard is 30 days.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Exceeds Standard

	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); NIC Investigating Sexual Abuse in a Confinement Setting Curricula; Specialized Investigator Training Certificates; Site Visit Observations; Interviews.</p> <p>115.34(a)(b)(c)(d): Policy ADM-20-24-02 establishes that the Sheriff's Office shall document, through employee signature or electronic verification, that employees have received and understand the training. In the case of investigators who investigate sexual abuse in the facility, it shall maintain documentation they have completed the required specialized training (<i>NIC's PREA: Investigating Sexual Abuse in a Confinement Setting in sexual abuse investigations</i>). The curriculum was reviewed by the Auditor and contains all required topics in provision (b). The Auditor interviewed (2) of the facility investigators and confirmed that the specialized training included 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 a case for administrative action or prosecution referral. The facility indicated there are (26) investigators currently employed who have completed the required training <i>NIC's PREA: Investigating Sexual Abuse in a Confinement Setting</i> course with (15) also taking the advanced course. This was verified through the Auditor's review of training certificates. Based on review of the employee training records in 115.31, these investigators have also completed the ASO's basic PREA training and are current with their annual refresher training.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. Additionally, the facility exceeds this standard by having (15) investigators that completed the Advanced Specialized Training course.</p>
--	--

115.35	<p>Specialized training: Medical and mental health care</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); WellPath Specialized Training Curricula; WellPath Specialized Training Certificates; National Institute of Corrections (NIC) Medical Training Curricula; NIC Specialized Medical Training Certificates; Site Visit Observations; Interviews</p> <p>115.35(a)(c)(d): ADM-20-24-02 establishes that the Alexandria Sheriff's Office shall ensure that all full and part-time medical and mental health care practitioners who work regularly in its facility have been trained in: how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of</p>
---------------	--

	<p>sexual abuse and sexual harassment. The facility provided (18) completion certificates for medical staff for <i>WellPath Prison Rape Elimination Act Training</i> and the training curriculum confirming that the training includes the required topics and all medical staff have completed the training. Additionally, WellPath (medical) must complete the same training as prescribed for employees under 115.31 and a review of these training records confirmed all medical staff have received the basic PREA training. The facility also provided (7) certificates of completion for the <i>NIC PREA Medical Healthcare for Sexual Assault Victims in Confinement Settings</i>. Curricula reviewed contains (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. The Health Services Administrator (HSA) and Director of Nursing (DON) confirmed during their interviews that all new medical staff hired must complete the WellPath PREA training during their onboarding. The Auditor also verified completion of training during interviews with (2) medical staff and (4) behavioral health staff.</p> <p>115.35(b): ASO does not conduct forensic examinations at the facility; therefore, the facility meets this provision through non-applicability.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Standard Operating Procedure 22.05, Classification Process; Objective Screening Instrument; Reassessment Screening; Mental Health Screenings; Site Visit Observations; Interviews.</p> <p>115.41(a)(b)(c)(d): ADM-20-24-02 and policy 22.05 establishes that all inmates shall be assessed during the classification intake screening interview for their risk of being sexually abused by other inmates or sexually abusive toward other inmates using an objective screening instrument. The classification interview shall ordinarily take place within 72 hours of arrival at the facility. The PREA Coordinator explained that classification counselors are responsible for conducting the initial risk screening, the 30-day risk screening, and any risk screening that is required based on additional information received or after an incident of sexual abuse. The facility reported on the PAQ that 1185 inmates had entered the facility during the audit period and 100% of them were screened for risk.</p> <p>The Auditor interviewed the Classification Manager and (1) Classification Counselor and asked for a demonstration of the intake classification interview and risk screening</p>

process. During this demonstration, the Auditor observed that the process occurs in an interview room which is private and is out of earshot of other inmates and of staff who would not otherwise participate in the screening process. Both staff used conversational, open-ended questioning and phrased the screening questions in a manner that fosters comfort and elicits responses. In order to assess the inmate's risk, the Alexandria Sheriff's office PREA Victimization and Abusiveness Risk Assessment form is used to collect information during the risk screening process. This form was reviewed by the Auditor and found to include all questions required to be considered in subpart (d) and (e). (The facility does not house inmates detained solely for civil immigration purposes.) The demonstration concluded that screening staff affirmatively ask inmates about their sexual orientation and gender identity by directly inquiring if they identify as LGBTI (in addition to making a subjective determination about perceived status). In addition to asking the questions, classification staff use information obtained from the inmate's booking records and any medical or mental health information relevant to the screening that is available. The instrument produces two scores, one for risk of victimization and one for risk of abusiveness. These scores are derived from totaling the number of yes answers and certain questions are flagged for an automatic risk evaluation if answered yes. Based on the answers provided on the screening form, an individual may be classified as a Sexual Assault Victim Risk (SAVR) or an Aggressive Sexual Assault Risk (ASAR). Individuals who score a five or more on the victimization-related questions will be classified as SAVR and those who score a four for the aggressiveness-related questions will be classified as an ASAR. Both classification profiles will have an alert notation completed. The information from the risk screening is used to determine appropriate housing for each inmate, ensure appropriate interventions such as mental or medical support and most importantly to ensure victims and abusers are not housed together. The PREA Coordinator and Classification Manager explained that monthly a list is compiled of all inmates who have an alert of SAVR or ASAR to ensure that inmates with an ASAR flag are not housed in unsupervised units or with an inmate flagged as SAVR. During interviews with (31) inmates, the Auditor confirmed that the risk screening was conducted by classification staff in a private setting and that the questions were asked directly by the staff member in a manner that made the inmates feel comfortable considering the sensitivity of the content. The Auditor's review of (64) randomly selected risk screening instruments completed between March 3, 2023 through July 21, 2024, and concluded that the initial screening is consistently completed within 72 hours of the inmate's arrival at the facility. Additionally, the random selection also included (3) inmates who arrived during 2021/2022 and all three risk screening instruments were completed within 24 hours of arrival. The Auditor wants to note that (28) of these (64) inmate records reviewed were booked into the facility between June 12, 2024 and July 21, 2024 (during the post-audit period).

115.41(d)(e): ADM-20-24-02 establishes that assessments shall be conducted using an objective screening instrument that shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: whether the inmate has a mental, physical, or developmental disability; the age of the inmate; the physical build of the inmate; whether the inmate has previously been incarcerated; whether

the inmate's criminal history is exclusively nonviolent; whether the inmate has prior convictions for sex offenses against an adult or child; whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; whether the inmate has previously experienced sexual victimization; the inmate's perception of his or her own vulnerability to sexual abuse or sexual harassment; and whether the inmate is detained solely for civil immigration purposes. (The facility does not house inmates detained solely for civil immigration purposes.) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive. Sexual victimization history is also asked on the Medical History and Physical Assessment with Mental Health form. The Auditor reviewed the risk screening instrument and found it to be objective and to contain all information required to be considered for risk. The Auditor needs to note that during the post-audit review of documentation it was found that one of the questions, "Whether the inmate has prior convictions for sex offenses against an adult or child?" had been removed from the SAVR section, but was included in the SAVR section on some of the more recent screenings. When this was brought to the attention of the PREA Coordinator she explained that the facility had an independent mock audit conducted a few months prior to this audit. During the mock audit, that auditor recommended deletion of this question from the SAVR. The facility modified their instrument and for a short time between the implementation of their previously revised instrument and the newly revised instrument, assessments did not include consideration of this during the risk screening for victimization. Once this Auditor identified that this question was missing and advised the PREA Coordinator, she immediately revised the instrument to include this question and implemented use of the revised document. The classification unit reviewed inmates who arrived during the period when the other instrument was used and who were still at the facility to ensure that the missing question did not affect the SAVR score. Based on their review, had the question been answered affirmatively the SAVR results would not have changed. The Auditor requested additional completed screening instruments for review to ensure the new form was being used consistently. There were (28) inmates booked into the facility between June 12, 2024 and July 21, 2024 and the facility provided complete risk screening instruments for all (28) which had been completed on the updated risk screening form. The Auditor concludes that the facility has sufficiently addressed this issue and is found compliant.

115.41(f): ADM-20-24-02 establishes that within no more than 30 days from the inmate's arrival to the facility, the Sheriff's Office shall reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the agency since the intake screening. In addition, all inmates are reassessed within the first 30 days of incarceration for sexual safety when the initial medical screening is conducted by medical staff. Medical staff will conduct a reassessment of each inmate's risk of victimization or abusiveness during the initial physical which is conducted within 14 days of commitment to the detention center. Each reassessment conducted by medical staff will be forwarded to the Classification Unit for review and placement in the inmate's classification file. Additionally, effective March 21, 2024, the ASO jail management system was updated in order to track 30-day PREA

reassessments. The "classification due" function was updated to assign an alert for PREA reassessments. Inmates will show up on the Classification List 15 days from their date of commitment. ASO inmates will have a reassessment completed by their classification counselor and/or medical staff. The facility provided a screen shot of the Jail management alerts, and the notice to staff of the change and a sample of medical reassessments completed by classification since the upgrade to the jail management system. The facility indicated on the PAQ 353 inmates entered the facility within the audit period and 100% were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival. The Auditor reviewed (22) inmate records between January 17, 2024 and July 09, 2024 and determined they all received a 30-day reassessment. Additionally, the Auditor reviewed documentation confirming rescreening occurs based on a PREA allegation, when appropriate. This is the first audit for the facility and the PREA Coordinator independently identified the deficiency with provision (f) and sufficiently implemented corrective action. Since implementation of the corrective action plan the facility has consistently completed reassessments within 30 days of the inmate's arrival at the facility. Based on these findings the Auditor concludes the facility is substantially compliant with provision (f).

115.41(g): ADM-20-24-02 states an inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. The facility provided (3) samples of incident-based reassessments for the Auditor's review confirming compliance with this provision. The Auditor interviewed the Classification Manager, (1) Classification Counselor and the PREA Coordinator confirming that inmates are reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

115.41(h): ADM-20-24-02 establishes that inmates may not be disciplined for refusing to answer, or for not disclosing complete information related during the risk screening process.

115.41(i): Risk assessments are kept in the inmate classification file which are maintained in locked cabinets behind a locked door. Files must be checked out and may only be retrieved by staff who are involved in management and treatment decisions at the facility. Based on interviews with (2) classification staff and the PREA Coordinator, access to risk assessments and related information in the jail management system is granted based on job duties and controlled by user access protocols.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.

115.42	Use of screening information
	Auditor Overall Determination: Exceeds Standard

Auditor Discussion

Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Intake Screening-based Housing Case Notes; Individualized Transgender Housing Assessment & Safety Review; Application Review Sheet (Classification Assignments); Site Visit Observations; Interviews

115.42(a)(b): ADM-20-24-02 states the Sheriff's Office shall use information from the risk screening to make informative decisions regarding housing, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Assessments shall be conducted using an objective screening instrument. Each inmate is screened using an objective instrument based on criteria set forth in standard 115.41. Interviews with the Classification Manager and (1) Classification Counselor learned that based on the answers provided on the screening form, an individual may be classified as a Sexual Assault Victim Risk (SAVR) or an Aggressive Sexual Assault Risk (ASAR). Individuals who score a "5" or more on the victimization-related questions will be classified as SAVR and those who score a "4" for the aggressiveness-related questions will be classified as an ASAR. Both classification profiles will have an alert notation completed in the facility's inmate electronic management system. The PREA Coordinator explained that information from the risk screening is used to determine appropriate housing for each inmate, ensure appropriate interventions such mental or medical support and most importantly to ensure victims and abusers are not housed together. Additionally, the PREA Coordinator and Classification Manager explained that a list is compiled monthly of all inmates who have an alert of SAVR or ASAR which is distributed to the Inmate Management Team (IMT) to ensure that inmates with an ASAR flag are not housed in unsupervised units or with an inmate flagged as SAVR. The Auditor was provided with the April and May 2024 lists and the Auditor randomly reviewed inmates from the list compared to the roster and found that SAVR and ASAR flagged inmates were not housed together. When an inmate rates as both, an individualized decision will be made based on all available information. Paper copies of the risk assessments are kept in the inmate classification file which are in the designated file room in locked file cabinets. Access to risk assessments in the facility's jail management system is assigned according to user profile on a need-to-know basis and tied to the employee's job responsibilities. Only those with management and treatment responsibilities are granted access to the information collected. The PREA policy also establishes that the ASO shall make individualized determinations about how to ensure the safety of each inmate.

Inmates are retained in the booking area for up to 72 hours for observation and in order to complete the classification intake screening and medical screening process. Classification counselors have daily contact with the inmates during this process and detailed notes are entered into the jail management system about their behaviors displayed and information collected that pertains to safety risks. The Classification Manager and (1) Classification Counselor explained during their interviews that the IMT meets on a weekly basis to discuss pertinent information that should be considered when making management and housing decisions. Any relevant

information is collected and shared through the IMT minutes which is in place to communicate critical information to facility staff daily. These IMT minutes convey to supervisors and management staff security, safety, medical needs of specific inmates, to include those who are flagged as SAVR or ASAR. The Auditor reviewed IMT minutes connected to inmates flagged as SAVR. Conversations with booking deputies and security supervisors and classification and behavioral health staff confirmed that these IMT minutes are distributed daily and relied upon for making assignments such as housing, work, and programming. The facility has three work assignments which include Housing Unit Worker, Work Force Program (Kitchen/Laundry), and Work Detail Program (In House Only). Due to the short length of confinement at the facility few inmates are assigned to work details during their stay. Work assignments are made through application using the Applicant Review Sheet which includes a section for "Risks" and "Keep Separates" indicating that SAVR and AVAR risk levels are considered by the classification committee when making job assignments. The Auditor was provided samples of the Applicant Review Sheet and Classification Notes for review.

115.42(c)(d)(e)(f): ADM-20-24-02 establishes that in deciding whether to assign a transgender or intersex inmate to a housing unit for male or female inmates, and in making other programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate. A transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. Additionally, transgender and intersex inmates shall be given the opportunity to shower separately from other inmates. During the PREA Coordinator's interview, she explained that the facility hosts a multidisciplinary team meeting before a transgender or intersex inmate is rehoused from booking. This meeting is convened to determine housing and program assignments for transgender or intersex inmates and considers whether the placement will ensure the inmate's health and safety as well as whether the placement would present management or security problems. She explained that the inmate's own views with respect to safety is given serious consideration by the team when making placement decisions. This multidisciplinary team consists of representatives from classification, medical, mental health, and security to ensure the safety and security of the inmate and the orderly operation of the facility. At a minimum, the housing team considers the inmate's own views with respect to their safety; custody level; physical layout and staffing of potential units/housing and shower access; mental health and medical needs; victimization or predatory risk factors; transitional history (treatments/hormones); how the inmate identifies in the community/gender expression; criminal history; jail experience and prior facility adjustment. The PREA Coordinator also explained that transgender inmates are placed on the weekly IMT minutes and reviewed every Thursday; the review includes any inmate concerns, housing, work and program needs. During a transgender/intersex inmate's initial intake interview they are advised of their right to shower during the lockdown periods. Their request is documented in their housing

memorandum and their preference can be changed as needed. The facility provided documentation for (2) transgender inmates and the Auditor requested documents for the (1) transgender interviewed, which included communications to staff via memorandum (stating housing preference, use of pronouns, showers, and search requests), Gender Identity and Search Request Form, and risk screening/rescreening for each confirming that individualized decisions are made by the classification committee and communicated to facility staff promptly and regularly. Documentation in the communications reviewed indicated the facility has well-implemented procedures for management of transgender/intersex inmates. The Auditor interviewed the (1) transgender inmate who was housed at the facility during the site visit and was told that he has talked to medical, classification, and the PREA Coordinator; that they asked about any concerns for safety, search preference, and living unit gender preference. The inmate confirmed having no problems in general population and was not placed in segregated housing for high risk. Additionally, the inmate was aware that shower would be allowed during a time when other inmates on the unit were locked down but declined stating the individuals stalls and curtains provide sufficient privacy. The Auditor was advised during the post-audit period by the PREA Coordinator that the inmate had reconsidered and requested to shower during unit lockdown periods, which is being allowed. This information was supported by documentation provided to the Auditor for review.

115.42(g): ADM-20-24-02 establishes that the ASO shall not place lesbian, gay, bisexual, transgender, or intersex (LGBTI) inmates in dedicated housing units solely on the basis of such identification or status unless pursuant to a legal settlement or judgment. ASO does not have dedicated housing for LGBTI inmates which was confirmed through interviews, review of the housing rosters, and personal observations during the site visit. Interviews with (1) transgender inmate and (1) gay inmate, and (1) bisexual and was told that they were placed in general population and not in a housing area designated for only LGBTI inmates.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. Additionally, the facility exceeds provision (c) of this standard by implementing a comprehensive review during the weekly IMT meeting regarding the overall classification decisions of inmates which includes transgender/intersex inmates each week.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Segregated Housing Documents; Site Visit Observations; Interviews
	115.43(a)(b): ADM-20-24-02 states inmates at high risk for sexual victimization shall

not be placed in involuntary segregated housing unless the agency has assessed all available alternatives and has determined that there is no available alternative means of separation from likely abusers. If the agency cannot conduct such an assessment immediately, the agency may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the fullest extent possible. If the agency restricts access to programs, privileges, education, or work opportunities, it shall document the opportunities that have been limited; the duration of the limitation; and the reasons for such limitations. The policy further establishes that the ASO shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. Such an assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing assignment is made pursuant to this section, the facility shall clearly document: the basis for the agency's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days, the agency shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. When the ASO learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.

The facility reports there were no inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment. As noted in 115.41, all inmates remain in booking until their initial classification and risk screening is completed. Additionally, there were no inmates in the past year held in involuntary segregation based on an allegation of sexual abuse. The Auditor reviewed (15) case files and found no evidence that the victim was placed in segregated housing after making a PREA allegation. There were no inmates in segregated housing for risk of sexual victimization or who have alleged to suffer sexual abuse during the site visit to interview. The Auditor interviewed (3) inmates who reported a PREA allegations during the audit period; (2) stated they were not placed in segregation but (1) claimed to have been placed in segregation as punishment for making the allegation. The Auditor requested and reviewed documentation that confirmed that the inmate was placed in administrative segregated housing prior to making the allegation and the placement was not for risk of sexual abuse. Additionally, the Auditor saw no indication during review of the case file that the inmate was retained in segregated housing due to the allegation. The Auditor interviewed (2) staff who supervise inmates in segregated housing and confirmed that inmates who are placed in segregated housing for protection from sexual abuse or after an allegation have access to the same privileges as general population inmates and that protective custody is not intended to be punitive. Any restricted access would be documented. The interviews also confirmed that inmates placed in segregated housing after an allegation of sexual abuse it is only temporary until the facility can ensure that adequate separation can be facilities from the alleged abuser which is normally less than 24 hours. No inmates have been housed involuntarily in protective custody for more than 30 days; however, if necessary, the circumstances would be reviewed at

	<p>least every 30 days to see if this separation is necessary. An interview with the Chief also confirmed that no inmates have been placed in segregated housing for sexual victimization or for reporting sexual abuse within the audit period. He further explained if it was necessary to place an inmate involuntarily in protective custody following a reported incident it would be for less than 24 hours and until the classification committee could appropriately reassign general population housing. The Auditor concluded that it is not the practice of ASO to place inmates in segregation involuntarily unless there are no other alternative housing options.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.51	Inmate reporting
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); 22.20 Detention of Foreign Nationals Policy; Inmate Handbook; PREA Brochures; MOU for Outside Reporting Agency - Alexandria Department of Emergency & Customer Communications; Third Party Reporting Methods; Child Reporting and Vulnerable Adult Statutes; Documentation of Verbal Reports; Case Files; Site Visit Observations; Interviews</p> <p>115.51(a)(c): The Auditor's review of the ADM-20-24-02 policy confirmed the agency provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. An inmate may privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse or sexual harassment, and staff neglect that may have contributed to such incidents by disclosing incidents of sexual misconduct, sexual contact, sexual abuse and sexual harassment to any Sheriff's Office employee, contractor, or volunteer either verbally, in writing or anonymously. This information is included on ASO's public website, in the inmate handbook, and in the PREA brochure. An inmate may also request that a third party such as a friend or family member make a report of sexual abuse or harassment by contacting the PREA Coordinator or the Policy and Oversight Section (IPO). The auditor placed a test call to 1111, which is the internal Investigations, IPO, and this call was answered by the IPO Commander. He stated that if it was after hours a voice recording would answer and the caller could leave information. The phone system is set up to notify him on his mobile phone when he has received a call on this number. The facility has essentially adopted an electronic mail system. Inmates may send messages through their tablets to administration staff. They have external communication via email. Any outgoing mail may be placed in an envelope, sealed and hand-delivered to the officer, a supervisor, or caseworker for processing. Each unit has a locked box that written correspondence may be dropped in. Outgoing mail</p>

content is not monitored unless the inmate is under investigation. Mail to the auditor, to and from victim services, or any other privileged correspondent would be handled according to the legal mail policy requirements. Additionally, the auditor dropped a note in three random boxes located on housing units to track how long it took to be reported; confirmation was provided to the Auditor they were received the next day. The Auditor interviewed (14) random staff and (3) security supervisors who were able to explain the various reporting methods available to inmates which included internal and external methods. They further explained that they will accept reports verbally, in writing, and including third party and anonymous reports. Once received they all expressed that they would immediately report it to their supervisor and document in a report as soon as possible, but no later than the end of their shift.

115.51(b): An inmate may report abuse or harassment outside of the agency by contacting the Department of Emergency and Customer Communications (DECC) or the ASO Investigations, Policy & Oversight Section. During the PREA Coordinator's interview, she explained the ASO maintains an MOU with the Alexandria Department of Customer Communications (DECC). Inmates are able to reach DECC from the inmate phones free of charge without entering their inmate pin number. Calls to DECC are not recorded or monitored. Upon receipt of a call from an inmate at the ASO, DECC will obtain information on the incident, make an event in their system titled PREA after disconnecting the call, the call-taker will contact the on-duty ASO watch commander by calling our control center. The call-taker will provide the watch commander with a summary of the call and a reference number for the event and document which watch commander they briefed. The watch commander will document the report in the ASO jail management system and begin a preliminary investigation and safety assessment. The auditor tested calls to 4444 (Alexandria Department of Emergency and Customer Communication), 2222 (City of Alexandria Public Defender's Office), 3333 (Federal Public Defender's Office). All were successfully completed, and auditor made connection with someone at the specified location who explained they would take the information from an inmate and immediately forward the information to the ASO/IPO. They further explained that the caller may remain anonymous upon request. The facility never houses inmates detained solely for civil immigration purposes.

In addition to explaining internal reporting methods, the ASO PREA Brochure informs inmates of multiple resources to include telephone numbers for the National Sexual Assault Line, Arlington County Sexual Assault Crisis Support, Virginia Family Violence and Sexual Assault Hotline, Washington DC Rape Crisis Center, Fairfax Office of Domestic Assault & Sexual Violence Services, Alexandria Domestic Violence, Alexandria Emergency Mental Health, Alexandria Victim Witness Program, and Alexandria Sexual Assault Hotline. During the site visit, the Auditor observed Zero Tolerance posters throughout the entire facility in all work areas, housing units, common areas, staff areas and booking. Intake sallyport and facility entrance had signage displayed. Signage is printed in English and Spanish in red and on sturdy material signage permanently affixed. All reporting methods are listed with telephone numbers where available. Additionally, each housing unit phone bank has a supplemental Zero Tolerance poster that provides detailed calling instructions to use

the free call speed dial number. Third party reporting is explained on the Zero Tolerance posters with a number that 3rd parties may make a report: 703-746-5008. Zero Tolerance posters were observed throughout the entire facility in all work areas, housing units, common areas, staff areas and booking. Intake sallyport and facility entrance had signage displayed. Signage is printed in English and Spanish in red and on sturdy material signage permanently affixed. All reporting methods are listed with telephone numbers where available. The auditor tested calls to 4444, 1111, 2222, 3333. All were successfully completed, and the Auditor made connection with someone at the specified location who explained they would take the information from an inmate and forward to IPO. Signage was also observed placed on units that were not currently in use. Information was found to be current and accurate. Emotional Support signage was also well-placed next to phone banks in every housing unit in both English and Spanish translations notifying that it is a free phone call with English and Spanish options. The call may be private using the speed dial 5555 to the Alexandria Sexual Assault Center Hotline. Signage was laminated, simple, easy to read by average height person from the phone. The Auditor placed a test call to the 5555 and successfully completed a call to the Alexandria Sexual Assault Center. The signage throughout the facility could be easily read/accessed by persons in the facility. Signage language was found to be clear and easy to understand. Signage for emotional support services and external reporting included language that clearly details what services are available and for what purposes. Signage is provided in English and Spanish and can be translated for the other languages most commonly spoken in the facility as needed. The signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc. The information provided by the signage is not obscured, unreadable by graffiti, or missing due to damage. The information on the signage is accurate and consistent throughout the facility. Conversations with staff and inmates confirmed that the signage is always posted and not just displayed for the audit. Audit Notices were well placed and conspicuous. Notices were observed posted at entry to facility; inside the lobby; in each housing unit; in medical; on staff bulletin board; in interview rooms; at elevator entrances; in booking; at intake entrance sallyport. Specific locations the signage was observed included 1A Housing Unit, 1B Housing Unit, 1CD Housing Unit, 1EF Housing Unit, 1st Floor Elevator Landing, 1X Housing Unit, 1Y Housing Unit, 2AB Housing Unit, 2C Housing Unit, 2D Housing Unit, 2E Housing Unit, 2F Housing Unit, 2M Staff Lounge, 3AB Housing Unit, 3CF Housing Unit, 4AB Housing Unit, 4CF Housing Unit, 4G Housing Unit, Captains Row, Control 1 Lobby, Door 8IRC, Medical Waiting Area, Visitors Center, Visitors Elevator.

Based on (31) inmate interviews the Auditor concluded that all inmates are aware of both internal and external methods for making a private report of sexual abuse, sexual harassment, retaliation, or staff misconduct or negligence. Most inmates stated they would have no problem making a report of this nature directly to the housing deputy. Additionally, they knew that the Director of Inmate Services is the direct point of contact for PREA issues and stated they could reach out to her if they had a problem. All inmates understood that they could have someone on the outside make a report for them through third party methods and that they could remain

	<p>anonymous if they chose to. Inmates stated they could use the phone, put a report in writing, or tell someone verbally.</p> <p>115.51(d): The PREA Coordinator explained that ASO staff can privately report sexual abuse and harassment to the ASO IPO section, or they can make reports directly to the Alexandria Police Department. This information is conveyed to staff during the PREA training and policy review. Staff were aware that they can privately report sexual abuse and sexual harassment of inmates directly to the IPO section or APD and skip their chain of command if they feel it is necessary.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. Additionally, the Auditor finds the facility exceeds this standard by providing extensive avenues for inmate reporting, maintaining an MOU for an external call center to receive reports, and for communicating this information effectively to the inmate population.</p>
--	--

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); ASO Grievance Policy 23-04; Case Files; Site Visit Observations; Interviews.</p> <p>115.52(a): Based on the auditor's review of policies ADM-20 and 23-04 and interviews with the PREA Coordinator, the agency does not have administrative procedures to address sexual abuse grievances. The facility does not prohibit an inmate from making a report through the grievance process; however, it will be processed through the investigative protocols once received and not through the grievance process. Therefore, the remaining provisions (b-g) are not applicable. The facility meets this standard through non-applicability.</p>

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); PREA Brochure; Alexandria Sexual Assault Center Partnership Pamphlet; MOU Alexandria Department of Community and Human Services; Inmate Handbook; Site Visit Observations; Interviews</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Cooperative Agreement with ASO and INOVA Fairfax Forensics Team, Department of Community and Human Services</p>

(DCHS), Alexandria Victim-Witness Assistance Program, Alexandria Office of the Commonwealth's Attorney and the Alexandria Sheriff's Department; Alexandria Police Department Commission on Accreditation for Law Enforcement Agencies (CALEA); OPS-11 Physical Evidence Policy; Criminal Investigation Flow Chart; Site Visit Observations; Interviews

115.53(a)(b)(c): The ASO has entered into an agreement with the Department of Community and Human Services (DCHS) Sexual Assault Center (SAC) and Domestic Violence Program to make available to the victim an advocate from the sexual assault center. As a part of the Alexandria City SART agreement, the DCHS agrees to provide advocates 24 hours a day 365 days a year for emergency response to law enforcement and medical forensic exams, as well as provide professional and sensitive companion services to victims. Through an MOU with DCHS for emotional support services the facility will arrange an advocate in the event of an incident. Victim advocates may also be reached the inmate phone system (free and confidential). The advocates will provide emotional support, crisis intervention, information, and referrals. Inmates can contact the Alexandria Sexual Assault Hotline free of charge from the inmate phones also and these calls are not recorded or monitored, nor do inmates need to use their inmate pin to access this service. The ASO PREA brochure list resources and telephone numbers for local, state and national organizations. In addition, there are victim support posters in the housing units and on the tablets containing the mailing address and phone numbers for emotional support services. The inmate handbook has the number for the DCHS SAC hotline.

The Auditor observed signage was well-placed next to phone banks in every housing unit in both English and Spanish translations. Both phone numbers and mailing addresses are provided. The ASO PREA Brochure and Victim Support Services poster informs inmates of multiple resources to include telephone numbers for the National Sexual Assault Line, Arlington County Sexual Assault Crisis Support, Virginia Family Violence and Sexual Assault Hotline, Washington DC Rape Crisis Center, Fairfax Office of Domestic Assault & Sexual Violence Services, Alexandria Domestic Violence, Alexandria Emergency Mental Health, Alexandria Victim Witness Program, and Alexandria Sexual Assault Hotline. During the site review, the Auditor observed the brochures and signage available throughout the facility and determined it was readable and accessible, consistent, and placed throughout the facility. Victim Support Services signage was well-placed next to phone banks in every housing unit in both English and Spanish translations. Signage notifies inmates that the call to the Alexandria SAC Hotline is free, has English and Spanish options and that the call may be private using the speed dial 5555. Signage was laminated, simple, easy to read by average height person from the phone. The signage throughout the facility could be easily read/accessed by persons in the facility. Signage language was found to be clear and easy to understand. Signage for emotional support services and external reporting included language that clearly details what services are available and for what purposes. Signage is provided in English and Spanish and can be translated for the other languages most commonly spoken in the facility as needed. The signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a

	<p>wheelchair, etc. The information provided by the signage is not obscured, unreadable by graffiti, or missing due to damage. The information on the signage is accurate and consistent throughout the facility. Conversations with staff and inmates confirmed that the signage is always posted and not just displayed for the audit. The Auditor reviewed the MOU with the DCHS and successfully placed a test call to the 5555 DCHS Sexual Assault Center further confirming the services that are available to inmates confined at ASO. Based on (31) inmate interviews the Auditor concluded that all inmates are aware of the Victim Support Services available to them, that they are confidential and private, and how to access the services. The Auditor interviewed (3) inmates who reported sexual harassment who confirmed that staff provided them with a copy of the brochure during their initial interview after making the report and reminded them about the victim support services.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Website Search; Site Visit Observations; Interviews</p> <p>115.54 (a): ADM-20-24-02 states an inmate may request that a third party such as a friend or family member make a report of sexual abuse or harassment by contacting the PREA coordinator or the Investigations, Policy & Oversight Section. Third party reporting is explained on the Zero Tolerance posters with a number that 3rd parties may make a report: 703-746-5008. Zero Tolerance posters were observed throughout the entire facility in all work areas, housing units, common areas, staff areas and booking. Intake sally-port and facility entrance had signage displayed. Signage is printed in English and Spanish in red and on sturdy material signage permanently affixed. All reporting methods are listed with telephone numbers where available. An interview with the PREA Coordinator also confirmed that third party reports can be made by contacting the ASO IPO section or by contacting the Department of Emergency and Customer Communications. This information is located on the ASO public website and through signage throughout the facility. The Auditor called the 703-683-7273 (posted number) and reached the IPO section Commander. Additionally, the Auditor contacted the 703-746-4444, Department of Emergency and Customer Communications, and spoke with a representative who explained the process for receiving third-party reports. The Auditor reviewed the ASO website and found the reporting avenues posted.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.61	Staff and agency reporting duties
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 1453 416">Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p data-bbox="256 456 1477 1281">115.61(a)(b): ADM-20-24-02 states staff shall accept reports made verbally, in writing, and anonymously and shall promptly notify an on-duty supervisor and complete an Incident Report (F-SHR-0007). Staff can privately report incidents of sexual abuse, sexual harassment, and retaliation directly to the Investigations, Policy & Oversight Section or contact the Alexandria Police Department. Apart from reporting to designated supervisors or the Investigations, Policy & Oversight Section, staff shall not reveal any information related to a sexual abuse report to anyone except as specified by agency policy. During (14) random staff interviews the Auditor had them explain the steps for staff reporting. They were all knowledgeable of the procedures and stated that they would report the incident directly to their supervisor or the watch commander on shift immediately. Each staff member explained that the incident should not be discussed with anyone other than management or staff directly involved in the investigation or for making treatment decisions. These staff knew that they were required to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The Auditor's review of (15) case files confirmed that staff acted appropriately and promptly when becoming aware of an allegation of sexual abuse or harassment.</p> <p data-bbox="256 1321 1469 1774">115.61(c): ADM-20-24-02 states medical and mental health practitioners shall report knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, or staff neglect pursuant to this section and inform the inmates of their duty to report, and the limitations of confidentiality at the initiation of services. Interviews with the HSA, DON, and (4) behavioral health staff confirmed that inmates are advised of the limitations of confidentiality and duty to report during the first interview/encounter. All were aware their duty to report knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment immediately upon learning of it. The Auditor's review of case files including an example where a behavioral health staff member forwarded a report of an allegation made by an inmate during a session which was handled appropriately and promptly.</p> <p data-bbox="256 1814 1445 2056">115.61(d): ADM-20-24-02 states if the victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the a/legation to the designated State or local services agency under applicable mandatory reporting laws. An interview with the Behavioral Health Services Team Leader confirmed that concerns of child abuse or neglect will be reported immediately to the local department of child-protective services in the</p>

	<p>jurisdiction where the child resides, where the abuse or neglect is believed to have occurred, or to the child protective services hotline in accordance with the Code of Virginia statute 63.2-1509. Concerns of abuse, neglect, or exploitation of vulnerable adults will be immediately reported to the local department of adult protective services in the jurisdiction where the adult resides, where the abuse or neglect is believed to have occurred, or to the adult protective services hotline in accordance with the Code of Virginia statute 63.2-1606.</p> <p>116.61(e): It is the policy of the Alexandria Sheriff's Office to prepare for, respond to, and administratively investigate all alleged incidents involving sexual abuse and sexual harassment in accordance with the Prison Rape Elimination Act of 2003 (PREA). All allegations are forwarded immediately to the IPO and the PREA Coordinator based on the Auditor's review of (15) case files and interviews.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.62(a): When the ASO learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate. The facility reported on the PAQ that in the past 12 months, there were no incidents where the facility determined that an inmate was subject to a substantial risk of imminent sexual abuse, which was confirmed during interviews with the Sheriff, Chief, and PREA Coordinator. During an interview with the Sheriff, he explained that if an inmate is subject to a substantial risk of imminent sexual abuse he or she will be placed in protective custody and the facility will act expeditiously to investigate and eliminate the threat. Interviews with (14) random staff and (3) security supervisors confirmed that if they become aware that an inmate is subject to a substantial risk of imminent sexual abuse they would immediately separate them from danger and forward a report to the IPO and advise the PREA Coordinator. The Auditor's review of (15) case files found no evidence that an inmate was placed in protective custody following a threat of imminent sexual abuse.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Outgoing & Incoming Facility-to-Facility Notifications of allegations; Site Visit Observations; Interviews</p> <p>115.63(a)(b)(c): The Auditor's review of the initial ADM-20-24-02 stated that upon the Alexandria Sheriff's Office receiving an allegation that an inmate was sexually abused while confined at another facility, the staff member that received the allegation will complete a PREA Information report utilizing an Incident Report (F-SHR-0007) to document the allegation and notify the captain of security through the chain of command. The captain of security will direct the PREA Coordinator or designee to draft a notification letter for signature. However, during the site visit on-site corrective action was immediately implemented for the policy to indicate that the notification needs to come from the Chief. The policy was revised to include the new procedure and was distributed to all staff through the facility's policy management system. The Auditor received a copy of the policy addendum and observed evidence indicating all staff had reviewed the reviewed policy and acknowledged understanding of the changes. The facility reported receiving (7) allegations that an inmate was abused while confined at another facility and that notifications were made to the other facility. ADM-20-24-02 also establishes that such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. The facility provided a sample of (3) notifications confirming that notification is made to the other facility within 72 hours of becoming aware of the alleged incident. The Auditor accepts the on-site corrective action as sufficient to meet full compliance with this standard.</p> <p>115.63(d): ADM-20-24-02 establishes that upon notification from another facility that an inmate was sexually abused while confined at the ASO, the ASO shall ensure the allegation is investigated pursuant to Investigations of PREA Incidents in ADM-20-24-02. ASO indicated on the PAQ there was (1) allegation of sexual abuse the facility received from another facility. The Auditor reviewed the investigative summary associated with this report concluding that reports received from other facilities are promptly investigated.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.64(a): ADM-20-24-02 establishes that when a deputy learns that an inmate has been sexually abused, they shall take immediate action to protect the inmate. This includes separating the inmate from the alleged perpetrator; preserving and protecting any crime scene until appropriate steps can be taken to collect evidence; and immediately contacting a supervisor.</p> <p>If the abuse occurred within a time (120 hours) that still allows for the collection of physical evidence, the staff is to request that the alleged inmate victim (and ensure that the alleged abuser) not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating. The facility reported there were (12) allegations received that an inmate was sexually abused. In all cases where the first responder was a security staff, the alleged victim and abuser were separated (where applicable). There were no allegations where the collection of physical evidence was necessary due to the nature of the allegations.</p> <p>115.64(b): If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. The procedure is outlined in ADM-20-24-02 and the facility's Coordinated Response Plan. There were (4) allegations that an inmate was sexually abused made in the past 12 months, where a non-security staff member was the first responder and where the first responder protocol was adhered to.</p> <p>Based on interviews with (2) security staff and (2) non-security staff and review of case files, all well-trained in their first responder responsibilities to take immediate action to protect the inmate and to take necessary action to preserve available evidence.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Facility Coordinated Response Plan; Site Visit Observations; Interviews</p> <p>115.65(a): The ASO Coordinated Response plan is documented on attachment (A) to policy ADM-20-24-02. The Coordinated Response Plan outlines a coordinated response</p>

	<p>to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and supervisors, including contact with external stakeholders as established through the facility's SART Cooperative Agreement as discussed in standard 115.21. The Auditor confirmed the coordinated response during an interview with the Chief and the PREA Coordinator.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Memorandum from Undersheriff Subject 115.66 A-1 Collective Bargaining; Interviews</p> <p>115.66(a): Based on a memorandum provided by the Undersheriff and subsequent interviews during the site visit, the ASO does not engage in collective bargaining agreements. The state of Virginia is a "right to work" state and is not obligated or governed by state law to unionize.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Retaliation Monitoring Documentation; Interviews</p> <p>115.67(a)(b): ADM-20-24-02 establishes that the Sheriff's Office policy is 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. If any other individual who cooperates with an investigation expresses fear of retaliation, the ASO will take appropriate measures to protect that individual against retaliation. The Sheriff's Office shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment</p>

or for cooperating with investigations. Interviews with the PREA Coordinator, Classification Manager, and (1) Classification Counselor confirmed that after an allegation is received the inmate's counselor meets with the inmate to determine if there are any housing or work changes needed. They explained that the facility will make every effort to ensure that the victim and anyone who reports an allegation or cooperates in an investigation feels safe and is removed from contact with abusers in a non-punitive manner. The inmate may be offered a different work assignment or possible change work shift if there is a need. The victim support services are available to assist with counseling if the inmate wishes to be connected with an outside counselor. An interview with the Sheriff confirmed that the ASO has a zero-tolerance for retaliation against any person who reports an allegation of sexual abuse or sexual harassment. He explained that the ASO has the ability to separate inmates by housing units and floors and that staff can be reassigned to courthouse duties if necessary. During the Chief's interview he explained that measures to protect inmates from retaliation include first removing the victim from contact with the aggressor and any affiliates, followed by a prompt and thorough investigation, and holding the responsible individuals accountable.

115.67(c)(d)(f): Retaliation monitoring will be documented on the Sexual Abuse Retaliation Monitoring Form (F-SHR-0107). Classification counselors will monitor retaliation for inmates assigned to their housing units. Retaliation monitoring for staff will be assigned on a case-by-case basis by the PREA coordinator. For at least 90 days following a report of sexual abuse, the Sheriff's Office shall monitor the conduct and treatment of inmates or staff who reported sexual abuse, and 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 and shall act promptly to remedy any such retaliation. The Sheriff's Office obligation to monitor shall terminate if the Office determines the allegation is unfounded. The Auditor reviewed the ASO PREA Sexual Abuse Retaliation Monitoring form. The form contains instructions which state "To be completed upon receipt of a sexual abuse allegation for monitoring of staff and inmates who report sexual abuse or for monitoring of inmates who are an alleged victim of sexual abuse. Retaliation monitoring can cease if an investigation determines No Evidence/Unfounded. Transfers of staff or an inmate does not discontinue retaliation monitoring which should be completed biweekly." The form includes the date the allegation is received, type of monitoring, assigned monitor, name of person being monitored, and reason for monitoring. Additionally, there are sections for selecting the action taken by the monitor during the bi-weekly monitoring including reviewed disciplinary reports, reviewed housing changes, face-to-face contact, reviewed program changes, reviewed performance evaluations, and reviewed staff reassignments. The form also contains a conclusion. Based on interviews with the PREA Coordinator, Programs Manager, and Classification Manager and (1) Classification Counselor, inmates are monitored for 90 days with bi-weekly documentation required of the monitoring. If there is a reason to continue the monitoring at the end of the 90 days they will extend the monitoring. During this monitoring, the counselor maintains contact with the inmate with check-ins and reviews any misconduct reports, negative performance reviews, observe if the inmate has been moved or been fired from a work assignment. The Auditor reviewed a

	<p>sample of (3) completed retaliation monitoring packets provided with the PAQ. The Auditor reviewed (15) investigation files of which (10) qualified for monitoring and each file contained the completed Sexual Abuse Monitoring form with actions taken and notes. The cases reviewed that had no inmate monitoring were noted with the reason that no monitoring was conducted or required. The PREA Coordinator explained that staff who cooperate with an investigation who express concerns of retaliation will be monitored for retaliation bi-weekly for 90 days with an extension beyond 90 days if deemed necessary. Monitoring may include a review of any changes to work assignments, a review of any negative performance reviews, and a direct check-in to talk with the employee to see if they are experiencing any issues. No staff were monitored during the audit period.</p> <p>115.67(e): If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation. The Auditor interviewed (3) inmates who made a PREA allegation at the facility and (2) stated they had experienced no retaliation after making their allegation but (1) told the Auditor that he experienced retaliation after he reported an incident. The Auditor reviewed the investigative file which contained evidence of staff retaliation monitoring. Documentation in the files indicated that when he reported he had experienced retaliation it was investigated; however, the investigation indicated the inmate was uncooperative and would not provide the investigator with any information related to his claim. As a result, the retaliation allegation was closed unsubstantiated.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.68(a): ADM-20-24-02 establishes that the ASO shall assign inmates who have allegedly suffered sexual abuse to involuntary segregated housing only until an alternative means of separation from the abuser can be arranged. Such an assignment shall not ordinarily exceed a period of 30 days. Use of segregation for this purpose is subject to the requirements of standard 115.43. The facility reported ASO had no inmates who alleged to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months. The Auditor interviewed (3) inmates who made a PREA allegation at the facility and (2) stated they were not placed in segregated housing following the report but (1) alleged to have been placed in segregation for over a month after making a PREA allegation. The Auditor</p>

	<p>requested and reviewed the facility records for this inmate's segregation assignment and found he was in segregation for an unrelated issue prior to making the report. An interview with the Chief confirmed that it is not the ASO's practice to place inmates in involuntary segregated house for protection after an incident of sexual abuse is reported but would use this for up to 24 hours if needed to ensure the victim was able to be separated from the abuser. He further explained the goal is to arrange alternative housing as soon as possible and that no inmates have remained in segregated housing for more than 24 hours following an incident of sexual abuse within the audit period. The Auditor interviewed (2) staff who supervise inmates in segregated housing and confirmed that inmates who are placed in segregated housing for protection from sexual abuse or after an allegation have access to the same privileges as general population inmates and that protective custody is not intended to be punitive. Any restricted access would be documented. The interviews also confirmed that inmates placed in segregated housing after an allegation of sexual abuse it is only temporary until the facility can ensure that adequate separation can be facilities from the alleged abuser which is normally less than 24 hours. No inmates have been housed involuntarily in protective custody for more than 30 days; however, if necessary, the circumstances would be reviewed at least every 30 days to see if this separation is necessary.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.71(a): ADM-20-24-02 establishes that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Further, ASO will ensure that allegations of sexual abuse, other than sexual battery, are referred for investigation to the Alexandria Police Department (APD) unless the allegation does not involve potentially criminal behavior. Allegations that are not referred to APD will be assigned a specially trained security supervisor to investigate the allegation by the Investigations Commander. When the ASO conducts its own administrative investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. In addition, upon receipt of any PREA allegation, the on-duty watch commander or designee will meet with the inmate and advise them of the investigative process by the end of the shift. The Auditor interviewed (2) investigators and confirmed that investigations are initiated immediately because the on-duty watch commander does a preliminary investigation and then the Lead</p>

Investigator provides oversight and determines how it should be assigned. They further explained that anonymous or third-party allegations are investigated in the same manner as any other allegation and in accordance with the ADM-20 PREA policy. The Auditor randomly selected (15) investigations for review and found they were all referred appropriately and immediately for investigation. There were no allegations referred for criminal investigation. The PREA policy also establishes that administrative investigations should be completed and submitted for supervisory review within 45 days from the time the agency was made aware of the sexual abuse or sexual harassment allegation and the supervisory review completed within 15 days of receiving the investigative files. This requirement demonstrates the agency's commitment to providing prompt investigations.

115.71(b): The PREA policy establishes where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34. The Sheriff's Office shall document, through employee signature or electronic verification, that employees have received and understand the training. In the case of investigators who investigate sexual abuse in the facility, it shall maintain documentation they have completed the required specialized training (NIC's PREA: Investigating Sexual Abuse in a Confinement Setting in sexual abuse investigations). The curriculum meets the requirements of this standard, as it includes 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 a case for administrative action or prosecution referral. The facility indicated (26) investigators currently employed who have completed the required training NIC's PREA: Investigating Sexual Abuse in a Confinement Setting course with (15) also taking the advanced course. This was verified through the Auditor's review of training certificates and interviews with (2) investigators.

115.71(c)(e): Interviews with (2) investigators and review of (15) investigative files confirmed that investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. ASO policy establishes that the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. Investigative files documented credibility statements in the reports reviewed by the Auditor and both investigators explained their method for assessing credibility which indicated individual assessments are made and credibility is not contingent on the individual's status as inmate or staff. The Sheriff's Office shall not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with an investigation which was also confirmed through interviews and case file reviews. There were no inmates at the facility who reported an allegation of sexual abuse to interview; however, the Auditor interviewed (3) inmates who reported sexual harassment and none were required to submit to a polygraph as a condition for investigating the allegation.

During the interview with (2) investigators the Auditor learned that the first steps in initiating an investigation are separating the victim and perpetrator, conducting basic interrogatives, making a determination of the exact nature of the allegation. The ASO ADM 20 PREA policy requires staff to immediately report any allegation or suspicion of sexual abuse immediately, which would prompt the immediate initiation of an investigation once the facility is aware. Once an allegation has been made and forwarded to the Investigations, Policy & Oversight Section (IPO) a review of statements, reports, video footage is conducted. The IPO commander establishes what the nature of the allegation is, and establishes if the accusation is sexual harassment, sexual abuse, sexual battery (Felony or Misdemeanor), etc. Once IPO establishes if the investigation is to be assigned to a field investigator, the casefile is built by IPO and provided to the investigator. The IPO provides video, interview, document, and other investigative support and oversight as needed. If there are informational gaps or missing essential steps or tasks, the IPO will guide the field investigator on how to collect or seek the required information. If the allegation is criminal (misdemeanor) or involves a staff member, the IPO retains primary responsibility for the investigation and the casefile is restricted to IPO only. An investigative fact-finding memorandum is drafted (in conjunction with a police report if criminal) that illustrates revelations, consistencies, anomalies, investigative methods, and a recommendation of finding. All recorded interviews, video footage, photos, supporting documents, and all other relevant information or evidence is uploaded to the electronic casefile. The Auditor's review of (15) case files confirmed these procedures are consistently adhered to during an investigation.

115.71(d)(h): The PREA policy establishes that investigations of alleged sexual abuse committed by a staff member, contract employee, or volunteer, may not commence until such time as the criminal investigation has been concluded. No compelled interviews will be conducted prior to consultation with the Commonwealth's Attorney's Office. The policy also establishes that administrative investigations shall be referred for prosecution if there are substantiated allegations of conduct that appears to be criminal. Interviews with (2) investigators confirmed that when evidence presents that a prosecutable crime may have occurred the Lead Investigator will consult with the Virginia Commonwealth Attorney's office to establish if a crime has been committed and gather what is needed to prosecute. This is done prior to the interviewing in a criminal case and the subject has to be provided with a Miranda warning. ASO investigations shall be referred for prosecution if there are substantiated allegations of conduct that appear to be criminal. There were no cases that produced prosecutable evidence.

115.71(f): ADM-20-24-02 establishes that ASO investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. During an interview with the Lead Investigator the Auditor was informed that during an administrative investigation part of his review is to identify any policy violations and to ensure that staff are accounted for and securing the units according to policy (rounds and visibility); additionally, an assessment is made as to whether the staff reported the allegation according to policy and were the proper steps taken in

maintaining safety of the victim and securing evidence. He further explained that all investigations are documented, both criminal and administrative. The investigative report contains investigative facts, summary of interviews, and documented evidence such as camera reviews, and the disposition or findings. The Auditor's review of (15) investigations confirmed these elements were properly documented in the written reports and that efforts were made to identify if staff actions or failures to act may have contributed to the allegation.

115.71(i): ADM-20-24-02 establishes that the Sheriff's Office shall retain all written reports required by this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years which was further confirmed during interviews with the IPO Commander/Lead Investigator and the PREA Coordinator. The Auditor observed the physical storage area of information collected related to PREA allegations and investigative files and found they were filed in a locked cabinet in the PREA Coordinator's Office with highly restricted access. Electronic information is protected through password protection and authorized on a need-to-know basis based on the employee's particular job duties. This was confirmed during interviews with the PREA Coordinator and the IT officer.

115.71(j): ADM-20-24-02 states the departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation. An interview with the IPO Commander/Lead Investigator explained that a staff member's resignation does not halt the investigation process. The investigation will continue in its entirety to include notifying the Alexandria Police Department or an appropriate licensing body if necessary. Case files reviewed also confirmed that the investigation continues even after an employee's resignation or the transfer/release of the victim. One investigation documented the investigator travelled to another facility out of state to conduct an interview with the victim after having been transferred during the active investigation. This investigation ultimately led to a substantiated finding and termination of the perpetrator.

115.71(l): ADM-20-24-02 establishes that when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. During interviews with the Sheriff, Chief, and PREA Coordinator the Auditor was advised that if a case is referred to the APD the facility's IPO section will act as the liaison to the APD and keep them abreast of the progress of the investigation. An interview with the IPO Commander/Lead Investigator confirmed that ASO IPO section fully cooperates with APD during investigations and that he would be the point of contact APD. He would keep abreast of the progress of the investigation and ensure that the PREA Coordinator and victim is informed of progress and outcome.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. The facility also demonstrated they will go above and beyond to ensure a thorough, complete, and objective investigation by funding out of state travel for an investigator to complete interviews with a victim who was transferred during the active investigation.

115.72	Evidentiary standard for administrative investigations
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1453 423">Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p data-bbox="256 456 1461 860">115.72(a): ADM-20-24-02 establishes that the PREA investigators shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated in administrative investigations. A review of (15) case files for administrative investigations by the Auditor determined that no standard higher than a preponderance of evidence was used to determine the investigation disposition. Of the (31) investigations closed during the audit period the dispositions were (16) unfounded, (7) unsubstantiated, and (8) substantiated. During interviews with (2) investigators, they explained that preponderance of evidence (51%) is the standard used to substantiate an allegation of sexual abuse or sexual harassment.</p> <p data-bbox="256 904 1326 983">A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.73	Reporting to inmates
	<p data-bbox="256 1187 991 1220">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="256 1265 544 1299">Auditor Discussion</p> <p data-bbox="256 1344 1453 1422">Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Completed Notification Outcomes to Inmates; Site Visit Observations; Interviews</p> <p data-bbox="256 1456 1477 2072">115.73(a)(b)(c)(d)(e)(f): ADM-20-24-02 establishes that following an investigation into an inmate's allegation that he or she suffered sexual abuse, the Sheriff's Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the Sheriff's Office did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate. Unless the allegation has been determined to be unfounded, following an inmate's allegation that a staff member committed sexual abuse against him or her, the Sheriff's Office shall subsequently inform the inmate whenever: the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at the facility; the Sheriff's Office learns that the staff member has been charged with or indicted on a charge related to sexual abuse within the facility; or the Sheriff's Office learns that the staff member has been convicted on a charge related to sexual abuse within the facility. Following an inmate's allegation that he or she has been sexually abused by another inmate, the Sheriff's Office shall subsequently inform the alleged victim whenever: the agency learns that the alleged</p>

	<p>abuser has been charged with or 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. All such notifications or attempted notifications shall be documented. The Sheriff's Office's obligation to report under this standard shall terminate if the inmate is released from the agency's custody. An interview with the PREA Coordinator confirmed that inmates who allege sexual abuse are notified of the disposition of the case upon conclusion of the investigation. Notifications of dispositions were made to (10) inmates; those who were not made were released prior to the conclusion of the investigation and in (1) case the allegation was made anonymously so there was no known victim to notify. Additionally, the facility provides notifications to inmates for sexual harassment cases even though the standard only requires notifications for abuse allegations which is above and beyond the minimum requirements. The facility provided copies of notifications confirming that they are documented. There were no criminal investigations conducted and no staff or inmates indicted for sexual abuse during the audit period; therefore, no notifications of this type were made.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard. The facility exceeds this standard based on providing disposition notification to inmates in harassment cases.</p>
--	---

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Termination of Staff Member; Licensing Board Notification; Site Visit Observations; Interviews</p> <p>115.76(a)(b)(c)(d): Policy ADM-20-24-02 establishes that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of the Sheriff's Office policies 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. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. ASO terminated (1) staff member based on (4) substantiated sexual harassment allegations. Based on documentation provided by the facility, the Deputy was reported to the Virginia Department of Criminal Justice Services for Notification of Eligibility for Decertification for Certified Law Enforcement Officer and Certified Jail Officer.</p>

	A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.
--	---

115.77	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.77(a)(b): ADM-20-24-02 establishes that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The Sheriff's Office shall take appropriate remedial measures and shall consider whether to prohibit further contact with inmates, in the case of any other violation of the agency's sexual abuse or sexual harassment policies by a contractor or volunteer. Based on an interview with the IPO Commander/ Lead Investigator and PREA Coordinator, in the past 12 months no contractors or volunteers have been involved in a PREA incident. An interview with the Chief confirmed that contractors or volunteers who violate the ASO PREA policy and related policies will be prohibited from returning to the facility and will be prosecuted if warranted. All facility access will be removed. The Auditor's review of the allegations tracking sheet and sample case files further indicated no contractor or volunteer violations of PREA.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Standard Operating Procedure #24.03, Inmate Rules of Conduct; Inmate Handbook; Case Files; Site Visit Observations; Interviews</p> <p>115.78(a)(b)(c): ADM-20-24-02 establishes that inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Sanctions shall be commensurate with the nature and circumstances of the abuse committed,</p>

the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. The disciplinary process shall consider whether an inmate's mental disability or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. The facility reported there were (5) allegations of inmate-on-inmate sexual abuse and none were substantiated. During an interview with the PREA Coordinator she provided clarification that the numbers entered on the PAQ were entered incorrectly and should have been (0) for the number of administrative findings of inmate-on-inmate sexual abuse. Inmates found to have perpetrated sexual abuse against another inmate will be charged in accordance with ASO policy 24.03. Criminal investigations where an inmate is found guilty of sexual abuse will be referred for prosecution. The Auditor's review of the allegations tracking spreadsheet and (15) case files confirmed there were no substantiated cases of inmate-on-inmate sexual abuse. However, (1) harassment case was substantiated, and the offending inmate was charged with a disciplinary infraction. During the Chief's interview he explained that any inmate found to have perpetrated sexual abuse against another inmate will be subject to disciplinary sanctions following the ASO disciplinary procedures and after a due process hearing. He explained that sanctions will be proportionate to the nature and circumstances of the act and taking into consideration the inmate's prior disciplinary history and sanctions imposed for similar offenses by other inmates. Additionally, the inmate would be referred to mental health for an evaluation prior to sanctions being imposed.

The Auditor's review of the Inmate Handbook found that inmates charged with a major violation will be given an Incident Report listing the charges and a hearing date at least 24 hours before the hearing. Inmates are allowed to have the hearing process explained to them, or they may receive help from staff to assist in preparing for the hearing or during the hearing by submitting a request at least one hour before the hearing. If the inmate is unable to collect and present evidence on their behalf, someone will be appointed to assist. During the hearing, an inmate may present any papers, documents or information about the incident and they are allowed to call witnesses on their behalf. The inmate has a right to be present at the hearing. The inmate has a right to appeal the decision of the hearing board.

115.78(d): ASO does not offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the sexual abuse. During interviews with the Behavioral Health Services Team Lead the Auditor was advised that the facility does not have a sex offender program although voluntary counseling is available to the inmates.

115.78(e): ADM-20-24-02 establishes that the ASO may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. An interview with the PREA Coordinator confirmed that no inmates have been disciplined for sexual conduct where the staff member did not consent.

115.78(f): For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not

	<p>constitute falsely reporting an incident, even if an investigation does not establish evidence sufficient to substantiate the allegation. The PREA Coordinator explained there have been no occurrences where an inmate has been disciplined for reporting an incident in good faith.</p> <p>115.78(g): Consensual sexual activity among inmates is prohibited. If inmates engage in this behavior, they will be subject to disciplinary action in accordance with ASO policy 24.03. Sexual behavior among inmates will only be considered sexual abuse if it is determined the activity was coerced or forced.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); Prior Victimization Mental Health Referrals; Informed Consent Template; Site Visit Observations; Interviews</p> <p>115.81(a)(b): The ASO William G. Truesdale Detention Center is not a prison; therefore, these provisions are not applicable.</p> <p>115.81(c): ADM-20-24-02 establishes that if the risk screening required in standard 115.41 indicates that an inmate has experienced prior sexual victimization or perpetrated sexual abuse, whether in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. The classification counselor that receives the initial report of prior sexual abuse during the initial intake risk screening interview will ask if the inmate would like to speak to a mental health professional. If the inmate would like the meeting, classification staff will generate a referral in AJIS to the mental health team. If the inmate declines the meeting, classification staff will document the declination in the initial classification summary. Behavioral health staff will meet with the inmate within 14 days of the intake screening. The Auditor requested and reviewed documentation of referrals and follow-ups for (11) inmates who indicated prior sexual abuse during the risk screening between October 2023-April 2024. The Auditor concludes that the facility completes the referral immediately and the inmate is seen well within the 14-day required time frame. The Auditor interviewed (4) inmates who reported prior sexual victimization during the risk screening confirming that the classification counselor offered a referral to a mental health practitioner, and they spoke to a mental health counselor within the next few days.</p> <p>115.81(d)(e): ADM-20-24-02 establishes that any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly</p>

	<p>limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, work, education, and program assignments. Medical and mental health practitioners shall obtain written informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18, in accordance with the Virginia mandatory reporting law. The Sheriff's Office shall implement appropriate controls on the dissemination of responses to questions asked pursuant to ADM-20-24-02 to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. Access to automated classification files is only available to classification staff and supervisors. Hard copy classification files are stored in filing cabinets within the classification offices. Medical and mental health records are strictly controlled and related hard copy files were observed stored in locked cabinets within the respective file rooms. All electronically stored records are controlled through password protection requiring authorization to these records based on job roles and responsibilities. Additionally, dissemination of sensitive information is limited to only staff who have a need to know for management and treatment needs of the inmate. The Auditor reviewed the WellPath PREA Acknowledgement for Adults form that is completed at the initiation of services (during the initial intake medical/mental health screening) with each medical and mental health care provider advising the inmate of the mandatory reporting of any knowledge, suspicion, or information pertaining to an incident of sexual abuse or sexual harassment that occurred within the facility. The form also explains that healthcare staff will obtain consent to release to essential personnel all information regarding sexual abuse that occurred in the community. During interviews with the HSA, DON, and (4) behavioral health staff the Auditor further confirmed that inmates are advised of the limits of confidentiality with regard to sexual abuse within the confinement setting and that consent will be obtained before releasing information about abuse that occurred in the community.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Case Files; Site Visit Observations; Interviews</p> <p>115.82(a)(b)(c)(d): ADM-20-24-02 establishes inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Inmate victims of sexual abuse while incarcerated shall be offered timely information about and</p>

	<p>timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. treatment services shall be provided to the victim without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Auditor reviewed (15) investigative case files and observed documentation indicating a medical and/or mental health evaluation was conducted when necessary upon receiving the allegation. There were no cases involving physical assault and no forensic medical examinations were conducted or necessary within the audit period. The Auditor interviewed the HSA, DON, and (4) behavioral healthcare staff confirming that inmates receive timely and unimpeded access to emergency medical treatment and crisis intervention services. ASO has 24/7 medical care and behavioral healthcare staff are on-call after hours for emergencies. In the event an inmate requires the noted services their access would be documented in a S07 incident report and in the medical contractor's records management system (CORE MER). In addition, the mental health contractor, DCHS, documents any services provided in their clinical notes. The HSA and DON confirmed that inmate 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; however, there have been no incidents within the audit period where this has been necessary. These interviews further confirmed that the nature and scope of services provided are determined according to the practitioner's professional judgment and following established policy parameters and are provided at no cost to the inmate.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	---

<p>115.83</p>	<p>Ongoing medical and mental health care for sexual abuse victims and abusers</p>
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Site Visit Observations; Interviews</p> <p>115.83 (a)(b)(c)(d))(e)(f): ADM-20-24-02 establishes that as a part of ongoing medical and mental healthcare, the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been sexually abused, or abusive, in a prison, jail, lockup, community corrections facility, or juvenile justice facility. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections, as medically appropriate. The facility shall provide such</p>

victims with medical and mental health services consistent with the community level of care. Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests, as medically necessary. If pregnancy results from the conduct described in this section, victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy related medical services, such as prenatal care and access to pregnancy termination services, where available. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. During interviews with the HSA, DON, and (4) behavioral health staff the Auditor was informed that inmates who have been sexually victimized in any prison, jail, lockup, or juvenile facility will receive evaluation and treatment consistent with community level services. These services will include evaluations, tests, referrals for services, emotional support, and continuing care for any sexually transmitted infections that may be present or pregnancy. These services are provided as soon as the practitioner is made aware of the need. Mental health evaluations may be conducted on known inmate-on-inmate abusers based on referrals and counseling is made available although not mandated. These interviews, interview with the PREA Coordinator, and review of the case files confirmed that there has been no sexual assault response necessary within the audit period.

115.83(h): The ASO William G. Truesdale Detention Center is not a prison; therefore, this provision is not applicable.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Case Files; Completed Incident Reviews; Site Visit Observations; Interviews</p> <p>115.86(a): ADM-20-24-02 establishes ASO conducts a post incident review for all substantiated and unsubstantiated allegations of sexual abuse per PREA standard §115.86. The Auditor randomly selected (15) cases from the (32) allegations reported for review which confirmed that the facility conducts a thorough incident review of all substantiated and unsubstantiated cases within 30 days of the investigation conclusion.</p> <p>115.86(c): ASO's incident review team is made up of and receives input from upper-level management officials, with input from line supervisors, investigators, and</p>

	<p>medical and mental health practitioners, and the PREA coordinator. Upon completion of the Incident Review, a memorandum is generated by the PREA Coordinator to the Sheriff through the chain of command.</p> <p>115.86(d)(e): The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; considers whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; examines the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assesses the adequacy of staffing levels in that area during different shifts; assesses whether monitoring technology should be deployed or augmented to supplement supervision by staff; and prepares a report of its findings, 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 the report to the Sheriff through the chain of command. The PREA Coordinator interview confirmed the incident review satisfies d1-d5 and each category is documented on the incident review form. The PREA Coordinator prepares the form; hosts the incident review. and prepares the plan(s) of action for committee's recommended changes. The review is submitted directly to the supervisor (undersheriff) for final review before implementing. The Auditor interviewed (8) members of the incident review team and all were knowledgeable about the review process and confirmed they had participated in reviews during the audit period which included elements as outlined in the standard. An interview with the Sheriff confirmed that recommendations made by the incident review team and supported by the PREA Coordinator will be implemented.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.87 Data collection	
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); PREA Definitions; Sexual Abuse Data Collection Spreadsheet; 2022 Completed SSV; Site Visit Observations; Interviews</p> <p>115.87(a)(b)(f): ADM-20-24-02 establishes the Sheriff's Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. ASO shall aggregate the incident-based sexual abuse data at least annually. A review of the ASO website confirmed the 2021-2022 Annual report was posted (https://www.alexandriava.gov/sheriff/prea). A review of the annual report confirmed comparisons of the previous</p>

	<p>year's data. An interview with the PREA Coordinator confirmed that she has tracked and compiled the aggregated 2023 PREA data; however, the 2023 Annual Report is still in progress and was pending receipt of additional data to finalize.</p> <p>115.87(c): ADM-20-24-02 states the incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The facility provided the completed SSV-3, <i>Survey of Sexual Victimization, 2022</i> for the Auditor's review.</p> <p>115.87(d): The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The facility provided the 2021-2022 annual report; the 2022 SSV; case files and an excel spreadsheet of aggregated data. The last request for SSV was 2022.</p> <p>115.87(e): ADM-20-24-02 states ASO shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates. However, the facility does not contract for the confinement of its inmates, therefore meeting this provision through non-applicability.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20-24-02 (PREA Policy); 2021 & 2022 Annual PREA Report; Sheriff's Annual Report Approval; Website Confirmation of Annual Report; Site Visit Observations; Interviews</p> <p>115.88(a)(b): ADM-20-24-02 establishes that the ASO shall 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: (1) Identifying problem areas; (2) Taking corrective action on an ongoing basis; and (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole. During interviews with the PREA Coordinator, Chief, and Sheriff the Auditor confirmed that the facility uses data from incidents to look at trends, determine future training/refreshers, modify policy and or procedures. A review of the ASO website confirmed the 2021-2022 Annual Report was posted (https://www.alexandriava.gov/sheriff/prea). A review of the annual report confirmed comparisons of the previous year's data and related information was included. An interview with the PREA Coordinator confirmed that she has tracked and compiled the aggregated 2023 PREA data; however, the 2023 Annual Report is still in</p>

	<p>progress and was pending receipt of additional data to finalize.</p> <p>115.88(c): The ASO PREA annual report shall be approved by the Sheriff and made readily available to the public through its website or, if it does not have one, through other means. The interview with the Sheriff confirmed the PREA Coordinator prepares the report, and he approves the PREA annual report before it is published.</p> <p>115.88(d): ASO includes no personally identifying data in the annual report. During interviews with the PREA Coordinator and Sheriff the Auditor was advised that if any portion of the report is redacted prior to making public these redactions would be limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility and the nature of the redacted information would be noted.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Site Visit Observations; Interviews</p> <p>115.89(a-d): ADM-20-24-02 establishes the Sheriff's Office shall ensure that data collected pursuant to Section VII. A. are securely retained. The Sheriff's Office shall 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. Before making aggregated sexual abuse data publicly available, the Sheriff's Office shall remove all personal identifiers. The Sheriff's Office shall maintain sexual abuse data collected pursuant to Section VII. A. for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise. The Auditor observed the files related to PREA stored in the PREA Coordinator's office in a locked filing cabinet behind a locked door with restricted access. Medical records are only accessed by medical and maintained in locked room/locked cabinet. Electronic information is password protected with only those who need access to certain information accessibility. An interview with the PREA Coordinator found that the annual report does not include personal identifiers; however, if that should change in the future, this information would be removed/redacted prior to being made public.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>

115.401	Frequency and scope of audits
----------------	--------------------------------------

	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Observations During Site Inspection; Information Obtained from Interviews.</p> <p>115.401(a): ADM-20-24-02 states that starting on a date to be determined by the PREA Coordinator, repeating each three-year period thereafter; the Sheriff's Office shall ensure that the William G. Truesdale Adult Detention Center is audited by a U.S. Department of Justice certified PREA auditor. The Sheriff's Office shall bear the burden of demonstrating compliance with the standards. This is the first PREA Audit for the facility.</p> <p>115.401(b): The facility meets this standard through non-applicability, as the ASO is a single-operated facility.</p> <p>115.401(h)(i)(m): During the onsite audit (June 17-20), The Auditor had access to, and observed, all areas of the audited facility. The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information) and was permitted to conduct private interviews with inmates.</p> <p>115.401(n): ADM-20-24-02 states the Sheriff's Office shall ensure at least one way for inmates to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. Prior to and during the on-site audit, the Auditor verified that notices were well placed and conspicuous. Audit notices were observed posted at entry to facility; inside the lobby; in each housing unit; in medical; on staff bulletin board; in interview rooms; at elevator entrances; in booking; at intake entrance sallyport. Specific locations included 1A Housing Unit, 1B Housing Unit, 1CD Housing Unit, 1EF Housing Unit, 1st Floor Elevator Landing, 1X Housing Unit, 1Y Housing Unit, 2AB Housing Unit, 2C Housing Unit, 2D Housing Unit, 2E Housing Unit, 2F Housing Unit, 2M Staff Lounge, 3AB Housing Unit, 3CF Housing Unit, 4AB Housing Unit, 4CF Housing Unit, 4G Housing Unit, Captains Row, Control 1 Lobby, Door 8IRC, Medical Waiting Area, Visitors Center, Visitors Elevator. No correspondence was received by the Auditor for this facility.</p> <p>A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.</p>
--	--

115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed: ADM-20 - 24-02 (PREA Policy); Information Obtained from</p>

Interview.

115.403(f): ADM-20-24-02 states the Sheriff's Office shall ensure that the auditor's final report is published on the public website and made readily available to the public. This is the first PREA Audit for the facility, therefore no historical PREA audit reports were available.

A systematic review and analysis of the evidence concluded the facility has demonstrated compliance with all provisions of this standard.

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

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

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

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

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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

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

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	Policies to ensure referrals of allegations for investigations	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	no
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

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

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

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

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

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

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

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

(f)		
	<p>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.)</p>	na