

PREA Facility Audit Report: Final

Name of Facility: Solano County Claybank Detention Facility

Facility Type: Prison / Jail

Date Interim Report Submitted: 09/27/2021

Date Final Report Submitted: 10/19/2021

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Eric Woodford	Date of Signature: 10/19/2021

AUDITOR INFORMATION	
Auditor name:	Woodford, Eric
Email:	eiw@comcast.net
Start Date of On-Site Audit:	08/10/2021
End Date of On-Site Audit:	08/12/2021

FACILITY INFORMATION	
Facility name:	Solano County Claybank Detention Facility
Facility physical address:	2500 Claybank Road, Fairfield, California - 94533
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	Bill Elbert
Email Address:	BElbert@solanocounty.com
Telephone Number:	707-784-7025

Warden/Jail Administrator/Sheriff/Director	
Name:	Captain Bill Hornbrook
Email Address:	WSHornbrook@solanocounty.com
Telephone Number:	707-784-7087

Facility PREA Compliance Manager	
Name:	Cathy Raymos
Email Address:	clraymos@solanocounty.com
Telephone Number:	O: 707-784-7787

Facility Health Service Administrator On-site	
Name:	George Bernardino
Email Address:	GBernardino@solanocounty.com
Telephone Number:	707-784-7154

Facility Characteristics	
Designed facility capacity:	358
Current population of facility:	138
Average daily population for the past 12 months:	90
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:	20-64
Facility security levels/inmate custody levels:	Ad-Sep, Max Security, Medium Security, Protective Custody
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	34
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	49
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Solano County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	530 Union Avenue Suite 100, Fairfield, California - 94533
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Bill Elbert	Email Address:	belbert@solanocounty.com

AUDIT FINDINGS

Narrative:

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

A Prison Rape Elimination Act (PREA) onsite Audit was conducted at the Solano County Claybank Detention Facility during the week of August 20, 2021 by Eric Woodford a US Department of Justice (USDOJ) certified PREA Auditor. This was the fourth PREA audit for the Solano County Jail Sheriff's Department. The first PREA audit was conducted in 2018.

On 5/4/21 the Solano County Sheriff's Office and auditor signed a PREA audit agreement to conduct PREA audits for each of its three correctional facilities. Term of the contract is from May 6, 2021 to April 30, 2024

On 4/23/2021 auditor contacted Just Detention International (JDI) and spoke with the Operations Director who indicated there has been no record of calls or correspondence regarding allegations of sexual abuse from the Solano County Jail Claybank Detention Facility over the past 12 months.

On 4/28/2021 auditor provided the agency PREA Coordinator with pre-audit documentation such as the pre-audit questionnaire, audit process map, audit documentation checklist and audit tour instructions. The auditor submitted an additional document request on 4/29/2021 for staff, contractor, volunteer and inmate listing in order to conduct a random selection for document review.

On 5/18/2021, auditor provided agency with Notice of Auditor poster language in both English and Spanish. Instructions on posting, date of posting deadline and proof of posting verification to be provided to the auditor accompanied the Notice of Auditor posting language.

Agency provided verification of posting on 5/18/2021, which was more than six weeks prior to the onsite audit. Agency included the facility schematics which were annotated to identify all areas where the Notices were posted throughout the facility. The Notices of Auditor were posted in all inmate living areas, hallways where inmates and staff travel throughout the facility, doorways that lead to each part of the facility for both staff and inmates, staff key-watcher boxes, facility lobby area, visiting, kitchen, break rooms, attorney visiting rooms, classification/receiving entry door, inmate kiosks in each housing unit, Alternative to Custody Program lobby, Claybank Jail lobby, door to PREA Compliance Manager office, medical and program rooms.

The facility completed the Pre-Audit Questionnaire (PAQ) on 5/27/21. Facility staff provided the auditor with a number of documents including schematics, policies, logs and other resources to the PAQ. A conference call was conducted with facility administration on 5/23/2021 to make introductions, establish the PREA Coordinator to be the point of contact (POC), discuss processes and expectations with the auditor. Mail process of correspondence between inmate and auditor was also discussed.

Agency provided requested lists for document review on 5/27/2021. Auditor made selections based upon hire date, gender, job positions and shifts. Auditor presented agency with random selections for document review on 5/28/2021. Auditor also requested investigation records, grievances, training records and personnel records pulled from the selections made by auditor. The agency provided the documents by 6/2/2021 for auditor to complete the document review worksheets for verification of compliance.

During the course of the Audit, the auditor reviewed the number of documents to assist in the triangulation of data and support the findings in the individual provisions. These documents included:

- Complete inmate roster - 113
- Youthful inmates/detainees - none
- Inmates with disabilities -none
- Inmates who are LEP – three
- LGBTI Inmates - one
- Inmates in segregated housing – 21 – none PREA related
- Residents in isolation - none
- Inmates/residents who reported sexual abuse - two
- Inmates/residents who reported sexual victimization during risk screening - none

- Complete staff roster - 43
- Specialized staff - 25
- All contractors who have contact with inmates - none
- All volunteers who have contact with inmates - none
- All grievances made in the 12 months preceding the audit - two
- All incident reports from the 12 months preceding the audit - none
- Allegations of sexual abuse and sexual harassment reported for investigation in the 12 months preceding the audit – (two sexual harassment cases)
- All hotline calls made during the 12 months preceding the audit – none
- 21 Randomly Selected Staff Files were reviewed
- 10 Randomly Selected Contractors files were reviewed – volunteers were barred from entrance into the facility over past 12 months due to COVID
- 24 Randomly Selected Inmate screening files were reviewed.

The PAQ noted that no internal or external audits except for the Bureau of California Corrections accreditations for the Claybank Detention facility. During the course of the audit the auditor exchanged numerous emails and phone conversations with the PREA Coordinator relative to document requests. The agency complied with all requests.

Auditor received no correspondence letters from a Solano County Jail, Claybank Facility inmate. One week prior to the onsite audit, auditor requested agency complete the Specialized listing of staff and provide a listing of staff, contractors and volunteers which provides for their duty shifts and titles or designations for onsite interviews. Listing for inmates to identify their housing units, gender, and earliest possible release date for formal interviews. Agency provided the requested lists three days later and auditor made random selections of staff based upon shifts and titles. The selections equaled seven staff members per shift. The contractors and volunteers were selected at random based upon their job titles. Inmates were selected based upon gender and housing unit, where the female inmates were oversampled. Auditor selected one inmate per page to a total of 16 random inmates. Auditor provided agency with a completed interview listing on first day of the onsite audit.

The on-site review began on 8/9/21 with an entry briefing. Attendees included the Facility Commander, Division Custody Commander, PREA Coordinator and PREA Compliance Manager. During the briefing, conduct of the audit was discussed including the audit timeline during the week. Auditor opened the floor for questions and provided responses for any questions asked. Following the in briefing, the physical plant review was conducted by the PREA Coordinator, PREA Compliance Manager and Division Custody Commander. The Claybank Facility is one building with a current population of 113. The facility maintains 10 multiple occupancy housing units, 10 open bay/dorm housing units, three segregation cells, Administration, Maintenance, medical clinic and others as noted in the following summary:

The site review was conducted as follows:

Living Unit: #430 - S & T – Modules - Female Dorm Setting - Q & R HOUSING UNIT "T" CLOSED due to limited inmate population

PREA Information Posted? Yes, in common areas and between phones in the modules

Auditor Notice Posted? In common areas throughout the facility and in each housing unit near phones

Opposite Sex Viewing? None

Camera Placement? Two cameras in each module, three cameras in hallway entrance to the housing unit

Announcement made? Yes How: Male on the floor – Announcement IMOGI outside front door to remind cross-gender staff to make announcement when entering housing unit

General Discussion with Inmates (Not Interviews) Inmates in housing unit explained PREA and indicated they were provided an Inmate handbook with Sexual Awareness Poster upon intake. They also viewed posters between phones and can recite what is on those posters as it relates to contacting advocacy and Rape Crisis through the hotline.

Phones: Two phones per module

Grievance Process: Grievance forms provided in Grievance box and submitted via Grievance box. Shift Sergeant clears box each shift.

Supervision (staff to inmate ratio): two staff to 38 inmates – COVID

Showers and Bathrooms (privacy, opposite gender viewing?): Each module have common bathrooms and separate showers with curtains

Recreation Areas/TV/Multi-Purpose: Library/classroom. Recreation yard with one camera each. Posters are in common areas.

Other: Housing unit contains a sewing room and laundry (off library). Only female staff are assigned to the housing unit. If short staff, female is assigned with a male and female will conduct count. Video visiting in each module.

NOTES: Module T closed due to limited female inmate population (COVID)

Living Unit: #410 - Q & R Modules – Female Dorm Setting

PREA Information Posted? Yes, by the phones

Auditor Notice Posted? Yes, on windows

Opposite Sex Viewing? No

Camera Placement? Two in each module

Announcement made? Yes – Male on floor - Announcement IMOGL outside front door to remind cross-gender staff to make announcement when entering housing unit

Phones: Two in each module

Grievance Process: Grievance forms provided by staff and submitted to staff.

Supervision (staff to inmate ratio): Two staff for 36 inmates – 1-18 now due to COVID – no male staff assigned

Showers and Bathrooms (privacy, opposite gender viewing?): Toilets in cells, two shower stalls in each module, showers with curtains.

Other: Housing unit contains a sewing room and laundry (off library). Only female staff are assigned to the housing unit. If short staff, female is assigned with a male and female will conduct count. Video visiting in each module.

NOTES: Auditor tested SafeQuest hotline #99. It did not connect. Interview with a few inmates during the onsite review determined that the hotline has not worked for a couple of days. Information provided by staff indicates that SafeQuest changed their number and may not have notified the Agency. Testing at the other two facilities is being initiated.

Living Unit: #100 ABCD – ADMINISTRATIVE SEPARATION – All Male Unit

PREA Information Posted? Yes – near phones and general area

Auditor Notice Posted? Yes – entry to housing unit

Opposite Sex Viewing? None

Camera Placement? Two in each module and one in the main control area

Announcement made? Not observed - Announcement IMOGL outside front door to remind cross-gender staff to make announcement when entering housing unit

Phones: Two in each module

Grievance Process: Grievance forms provided by staff and submitted to staff.

Supervision (staff to inmate ratio): One staff for 9 inmates per module

Showers and Bathrooms (privacy, opposite gender viewing?): Bathroom inside cell, two showers with curtains per module

Recreation Areas/TV/Multi-Purpose: Outside recreation yard – no multi-purpose room. Central day-room

Other: Room 106 – holding cell. Announce sign by door of each housing unit

Living Unit: #200 EFGH – MEDIUM/MINIMUM classification – All Male Unit

PREA Information Posted? Yes – near phones and general area

Auditor Notice Posted? Yes – entry to housing unit

Opposite Sex Viewing? None

Camera Placement? Two in each module and one in the main control area

Announcement made? Not observed - Announcement IMOGI outside front door to remind cross-gender staff to make announcement when entering housing unit

Phones: Two in each module

Grievance Process: Grievance forms provided by staff and submitted to staff.

Supervision (staff to inmate ratio): One staff for 18 inmates per module

Showers and Bathrooms (privacy, opposite gender viewing?): Bathroom inside cell, two showers with curtains per module

Recreation Areas/TV/Multi-Purpose: Outside recreation yard – no multi-purpose room. Central day-room

Other: Room 106 – holding cell. Announce sign by door of each housing unit

Living Unit: #300 - IJKL – ADMINISTRATIVE SEPARATION – All Male Unit – CLOSED SINCE 3/2020

PREA Information Posted? Yes – near phones and general area

Auditor Notice Posted? Yes – entry to housing unit

Opposite Sex Viewing? None

Camera Placement? Two in each module and two cameras in each common area

Announcement made? Not observed - Announcement IMOGI outside front door to remind cross-gender staff to make announcement when entering housing unit

General Discussion with Inmates (Not Interviews): None

Phones: Two in each module

Grievance Process: Grievance forms provided by staff and submitted to staff.

Supervision (staff to inmate ratio): Normally two staff for 18 inmates per module – all three shifts

Showers and Bathrooms (privacy, opposite gender viewing?): Bathroom and showers per module. Barriers erected to dissuade cross-gender viewing.

Recreation Areas/TV/Multi-Purpose: Outside recreation yard – no multi-purpose room. Central day-room

Other: Dormitory style modules. Announce sign by door of each housing unit

Living Unit: #300 - MNOP – MINIMUM classification – All Male Unit – CLOSED SINCE 3/2020

PREA Information Posted? Yes – near phones and general area

Auditor Notice Posted? Yes – entry to housing unit

Opposite Sex Viewing? None

Camera Placement? Two in each module and one in the main control area

Announcement made? Not observed - Announcement IMOGI outside front door to remind cross-gender staff to make announcement when entering housing unit

Other Notes:

Phones: Two in each module

Grievance Process: Grievance forms provided by staff and submitted to staff.

Supervision (staff to inmate ratio): Normally two staff for 18 inmates per module – all three shifts

Showers and Bathrooms (privacy, opposite gender viewing?): Bathroom inside cell, two showers with curtains per module

Recreation Areas/TV/Multi-Purpose: Outside recreation yard – education area. Central day-room

Other: Room 106 – holding cell. Dormitory style module for Inmate workers when Unit was open. Officers station has camera viewing. Announce sign by door of each housing unit

#720 Laundry

Hidden areas?: None

Camera Placement: Three cameras

Supervision: No staff assigned. Supervision is through the cameras in the laundry room. Laundry area moved to Stanton. Currently used for staff offices – no inmates allowed

Warehouse

Hidden areas?: Corrective action during last PREA audit, agency installed mirrors in back of warehouse to alleviate blind spots. Auditor noticed some boxes have been stacked which partially restricts mirror views. BLIND SPOT

Camera Placement: Five cameras

Supervision: One custody staff for five inmates

Receiving and Discharge (Intake)

Strip Areas (Private?): Conducted at main jail then again at Claybank Facility

Interview Areas (Confidential): Confidential interview rooms at both main jail and Claybank

PREA Information Posted: Yes, as observed in both facilities

Cameras: Observation cameras observed throughout both facilities in the intake area to include the vehicle sally port.

Receiving and Discharge (Cont.)

Phones?: Phones available in intake area and also in the holding tanks.

Ask for Information Provided to Offenders: Provided by intake officers to include PREA brochure and inmate handbook

Visitation

Strip/Shakedown Area: N/A – No contact visiting – attorney visiting through video or through glass

PREA Information Posted? Yes, in lobby entrance to visiting

Third Party Information Posted?: In lobby entrance to visiting and on Sheriff's website

Camera Placement: Cameras in lobby entrance

Chapel/ Religious Services

Multi-Purpose Rooms: Available for each housing unit

Education (Academic)

Classrooms: Four classrooms four male modules – One classroom four women's modules

Camera Placement: One camera per classroom – central control opens/closes doors

Supervision: One instructor for 14 inmates

Front Entrance (Reception Area)

PREA Information Posted: Yes

Third Party Info Posted: Yes

Food Service/Kitchen

Dining Rooms: Inmate food served in housing modules

Officer Dining Area: Staff dining is small break room with Notice of Auditor posters and one camera. No inmates work in food service

Kitchen Area:

Coolers: Two

Freezers: Two

Dry Goods Storage: None

Garbage Area: Located on the dock which has one camera

Dishroom: Covered by camera

Tool Room: Secured by Aramark staff

Camera Placement: Five cameras & two mirrors inside the kitchen. 1 camera on the loading dock

Supervision: Only Aramark staff work in kitchen – no inmates allowed

Isolated areas: Inmate bathroom area/hallway behind Aramark staff offices. Large mirrors installed during the last PREA Audit and they are still there with two additional mirrors.

Health Services

Reception Area: Yes, with PREA posters in English & Spanish

Exam Rooms: One

Treatment Rooms: None

Infirmary/Observation Rooms: None

Suicide Watch Room(s): If need for suicide watch, inmates take to Stanton facility

Ancillary Areas: None

Outside Areas

Power House? None

Outside Mechanical Service Shops: Building Trades no inmates allowed. No cameras

Garage: OES stores boats & vehicles in Maintenance building rollups.

Administration

Offender Access? None

PREA Information: None

Third Party Info: None

Formal interviews were conducted on between 8/3/21 and 8/5/21. Random staff, specialized staff, random and targeted inmate interviews were conducted by the auditor. The number of inmates housed at Solano County Jail on the first day of the on-site audit was 113.

Total inmate interviews conducted: 23

- Random inmates – 16
- Targeted inmates - 5
- Youthful Inmates - 0
- Physically disabled, blind, deaf, and/or hard of hearing inmates – 0
- Cognitively disabled inmates – 0
- Gay and/or bisexual inmates – 1
- Transgender or intersex inmates – 0
- Inmates in segregation for risk of victimization - 1
- Inmates who reported sexual abuse – 0
- Inmates who disclosed victimization during a risk assessment - 0

Total of staff interviews conducted: 43

- Random staff – 12
- Sheriff
- Undersheriff
- Superintendent -Captain
- Contract administrator
- PREA Coordinator
- PREA Compliance Manager
- Intermediate or higher -evel supervisors - 1
- Line staff who supervise youthful inmates - 0
- Education and program staff who supervise youthful inmates - 0
- Medical and mental health staff - 2
- Human resources staff - 1
- SAFE/SANE hospital staff - 1
- Volunteers-0 Due to COVID restrictions

- Contractors - 4
- Volunteer Coordinator - 0
- Investigators - 4
- Staff who perform risk assessments - 1
- Staff who supervise inmates in segregation - 1
- Incident review team members - 1
- Staff charged with retaliation monitoring - 1
- Intake staff - 1
- First Responders –Security - 1
- First Responders-non-security - 1
- Mail Room - 0
- IT Staff - 0
- Training Staff - 0
- Staff who respond to grievances - 1
- Victim Advocacy – 1
- Kitchen staff – 1
- Hearing/Disciplinary staff – 0
- Maintenance Staff - 1

The Solano County Jail Claybank Facility provides 3rd party reporting of allegations of sexual abuse via the Sheriff's website. The information is listed under their OPTIONS tab and includes citation of the Prison Rape Elimination act, their zero-tolerance policy and contact information for reporting allegations of sexual abuse.

The onsite audit was completed on 10/13/21 with a closeout briefing with administrative staff. Attendees PREA Coordinator, Custody Division Commander and the PREA Compliance Manager. Auditor discussed the strengths and weaknesses discovered during the onsite audit phase. Auditor provided administrative staff with the post-audit schedule which included providing agency with the Interim Summary Audit Report within 45 days after the completion of the onsite audit. Should the Agency come into Corrective Action, the auditor and agency will collaborate on the corrective action plans for any identified non-compliance issues. Agency will have 180-days to correct the non-compliant issues after which, the auditor has 30-days to submit the Final PREA Audit Report. Agency has 90-days to upload the Final Report to the agency website for public access.

The agency was informed that if necessary, auditor may need to return to the Claybank facility during the 180-day Corrective Action period to verify compliance with the PREA standards that were found non-compliant during the Interim Audit Phase.

AUDIT FINDINGS

Facility Characteristics:

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

The Solano County Jail Claybank Facility is located at 2500 Claybank Road in Fairfield. The facility was opened in 1979 as a Type III/IV facility, designed to house inmates that have been sentenced. It is also a Type IV facility used for work furlough programs. Design capacity of the facility is 379. The facility is a one story building that houses both female and male inmates. The Claybank Detention Facility has 358 rated beds distributed across twenty separate dayrooms, all of which have similar floor plans. There is a total of one hundred and forty-three cells that includes five dormitory style dayrooms; M, N, O, P & T. The M, N, O, and P dayrooms each have twenty-four rated beds and T dayroom has sixteen rated beds. There are thirty single occupancy cells; Cells 106 (Z1), 206 (Z2) & 406 (Z3) are used for administrative separation of hostile/violent inmates. There are one hundred and eight double occupancy cells.

Dayrooms A, B, C, D, E, F, G and H each have nine cells, with each dayroom having a rated bed capacity of fifteen. I, J, K, and L dayrooms have nine cells each, with each dayroom having a rated bed capacity of eighteen. Dayrooms M, N, O and P, are dormitory style dayrooms, each with twenty-four rated beds. Dayrooms Q and R have nine cells each, with each dayroom having a rated capacity of eighteen. S dayroom has nine cells and fifteen rated beds. T dayroom is a dormitory style dayroom with sixteen rated beds.

Each of the twenty dayrooms at this facility provides inmate access to a television, two telephones, two showers and a video visitation area. Restrooms are either located in each cell or communal toilets for I, J, K, L, M, N, O, P, S and T dayrooms. The dayroom showers have modesty curtains. There is one toilet located in each recreation yard. Each toilet has a concrete privacy partition and privacy film on adjacent yard windows. To ensure adequate safety of inmates, video surveillance is used to monitor all activity in the dayrooms and most locations inmates have access to. The dayrooms in each section is monitored via staff line-of-sight and video monitoring which provides views of dayroom common areas. For privacy, there is no video monitoring inside inmate cells except for dayrooms M, N, O, P and T which are open bay dayrooms.

Six officers are assigned to monitor twenty separate inmate housing dayrooms in this facility on day shift and swing shift; five officers are assigned on grave shift. The officers have a workstation located outside of the inmate dayrooms. Sixteen dayrooms, A through P, house male inmates and are located on the east side of the facility. Four dayrooms, Q through T, house female inmates and are located on the west side of this facility.

One officer is assigned to monitor dayrooms A, B, C and D; one officer is assigned to monitor dayrooms E, F, G and H. There are two officers assigned to monitor dayrooms I, J, K, L, M, N, O and P. Two officers are assigned to monitor dayrooms Q, R, S and T on day and swing shift. Both officers are usually female although one officer could be male depending on staff availability. One female officer is assigned to monitor Q, R, S and T dayrooms on grave shift. There is a Roving Officer assigned to the east side of the facility and another Roving Officer assigned to the west side of the facility on day and swing shift. There is one Roving Officer assigned to grave shift. There is one officer assigned to the facility control room. This is the staffing pattern on each of the three shifts at this facility Pre-Covid.

Claybank facility has 123 cameras and numerous mirrors throughout the facility. There are two outbuildings, Maintenance and the Warehouse. Inmates are prohibited entry in the Maintenance building. Only county maintenance workers have access to that building which is monitored by cameras. Inmates are assigned to work in the Warehouse which is also monitored by cameras and custody staff. Inmates may also work in landscaping and kitchen based upon classification. Programs available to inmates are Five Keys Charter School and Women's Re-entry Achievement Program (WRAP), Health-Rite 360, Narcotics Anonymous (NA), Alcoholics Anonymous (AA), Mental Health Services (MIOCR) and Religious Services. Due to Covid, only three inmates are currently assigned for work details. One works in the Warehouse and two work yard maintenance.

AUDIT FINDINGS**Summary of Audit Findings:**

The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy). Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	2
Number of standards met:	43
Number of standards not met:	0

Interim Report Standards of Audit Findings:

List of Standards Exceeded: 115.43, 115.82

List of Standards Not Met: 115.13, 115.17, 115.21, 115.51, 115.53, 115.403

Final Report Standards of Audit Findings:

List of Standards Exceeded: 115.43, 115.82

List of Standards Not Met: NONE

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	<p>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.11 (a): PREA Policy 5.041 mandates that in accordance with the PREA standards, the Solano County Sheriff's Office maintains a zero-tolerance policy for any act of assault, abuse, misconduct and harassment of a sexual nature perpetrated by another inmate, detainee or staff member, regardless of consent. The Sheriff's Office shall appoint an upper-level, agency wide PREA Coordinator, with sufficient time and authority to coordinate, develop, implement and oversee the agency efforts to comply with PREA standards. As PREA standards are adopted, each Facility Commander shall be responsible for ensuring PREA compliance in coordination with the PREA Coordinator. This policy applies to all inmates and personnel of the Sheriff's Office, including employees, volunteers and independent contractors, hereafter referred to as employees. Every Sheriff's Office employee, contractor and volunteer who has direct contact with inmates, either within or outside of the facility, but within a custodial setting, shall be trained in the detection of and mandatory reporting processes related to sexual abuse. Policy includes definitions and sanctions related to the Zero-Tolerance policy and the outline of the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.</p> <p>115.11 (b): PREA Policy 5.041 mandates that the Sheriff's Office shall appoint an upper-level, agency wide PREA Coordinator, with sufficient time and authority to coordinate, develop, implement and oversee the agency efforts to comply with PREA standards. As PREA standards are adopted, each Facility Commander shall be responsible for ensuring PREA compliance in coordination with the PREA Coordinator. Review of the Agency Organizational Chart finds the position of the Agency PREA Coordinator is a Lieutenant, third in line from the Sheriff, in the agency's organizational structure. Interview with PREA Coordinator indicates he has enough time to manage all of his PREA related responsibilities. There are three PREA Compliance Managers throughout the agency and they have a stake in PREA compliance within their respective facilities. He maintains communication with all three managers including the Facility Commander.</p> <p>115.11 (c): Solano CJ Organizational Chart identifies a PREA Compliance Officer at the level of Lieutenant for each of the three Solano County Jail Detention facilities. Each of the PREA Compliance Managers have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. All PREA Compliance Managers reports to the PREA Coordinator and the Custody Captain according to the Solano CJ Organizational Chart. Interview with the Solano CJ Claybank Facility PREA Compliance Manager indicates he has enough time to manage all of his PREA related responsibilities.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.11.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.12(a): N/A - The agency has not entered into or renewed a contract for the confinement of inmates since the last PREA audit, which occurred in 2018.</p> <p>115.12(b): N/A - The agency has not entered into or renewed a contract for the confinement of inmates since the last PREA audit, which occurred in 2018.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.12.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 453 237">Auditor Discussion</p> <p data-bbox="240 271 1493 797">115.13 (a): Agency provided auditor with copy of the PREA Staffing Plan Claybank - 12H Shift Plan KB 030321.pdf. The Staffing Plan dated 3/3/21 was created by the Claybank PREA Compliance Manager and PREA Coordinator, addressed to the Custody Captain. The staffing plan outlines the Claybank Facility's Dayrooms, Housing Units, Corridors & Support Spaces, Central Control, lobby/visiting areas, Classification, inmate population based on gender/race/age, Programs officer & Inmate Programs, Training, PREA Case Statistics, 12-hour shift staffing to include a staffing summary, which states: "For supervision and management there are a total of 2 duty positions for sergeants and 1 position for the facility commander. Total staff needed each week at the Claybank Detention Facility is 17 correctional officers, 2 sergeants and a facility commander". Video monitoring is addressed throughout the Staffing Plan in the Facility Dayrooms, Corridors & Support Spaces, Central Control and Lobby/Visiting sections of the Plan. Adequate levels of staffing is outlined in the Staffing Summary of the Plan. Agency reports that since the last PREA audit which occurred in 2018, the average daily number of inmates is 158. The average daily number of inmates on which the Staffing Plan was predicated is 246. Interview with the Facility Commander indicates that the Agency has a Claybank Facility Staffing Plan which provides for adequate staffing levels to protect inmates against sexual abuse, discusses video monitoring throughout the facility and is documented. The staffing plan is maintained in the Sheriff's Administrative offices. Interview with the PREA Compliance Manager indicates that the Claybank Facility Staffing Plan provides explanation of the same topics that are mandated in Standard 115.13.</p> <p data-bbox="240 808 1493 898">During the onsite audit of the Warehouse, auditor observed the 3 large mirrors installed along the back wall of the Warehouse had restricted views due to boxes being stacked along the lower part of the mirrors which partially restrict mirror views and created blind spots on each of the mirrors. This creates a safety hazard for both inmates and staff.</p> <ol data-bbox="240 931 1493 1043" style="list-style-type: none"> 1. Agency to remove boxes that restrict viewing. 2. Agency to provide photo verification of compliance or Auditor to re-visit facility to verify mirrors have full view of isles within warehouse <p data-bbox="240 1077 1493 1200">On 9/9/21 - The PREA Compliance Manager provided auditor with photos of the Warehouse mirrors which indicate that the boxes which disrupt each mirror's views of the back of the warehouse have been moved to open views to the back isles for safety purposes. On 9/13/21, auditor conducted an onsite review of the Warehouse for verification. Visit verified that the mirrors and cameras throughout the warehouse were PREA compliant.</p> <p data-bbox="240 1234 1493 1290">115.13 (b): N/A - PAQ and interview with Facility Commander reports that there have been no deviations from the Staffing Plan in the past 12 months. If there were, all deviations of the Staffing Plan would be documented.</p> <p data-bbox="240 1323 1493 1559">115.13 (c): Agency reports that at least once every year the facility/agency, in collaboration with the PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to:</p> <ol data-bbox="240 1391 1493 1491" style="list-style-type: none"> (a) the staffing plan, (b) the deployment of monitoring technology, or (c) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan. <p data-bbox="240 1491 1493 1559">Interview with the PREA Coordinator indicates that he is consulted annually regarding any assessments of, or adjustments to the Staffing Plan for the Claybank Facility.</p> <p data-bbox="240 1581 1493 1648">Agency has not provided auditor with a copy of the Annual Staffing Plan reviews as mandated by Standard provision 115.13(c). Agency to provide copies of Staffing Plan Reviews conducted annually since the 2018 PREA audit</p> <p data-bbox="240 1671 1493 1939">115.13 (d): Agency provided auditor with a copy of the Solid Reliable Ongoing Verifiable Training (SROVT) PREA Standards_Interview_Guide_1 with answer key.pdf dated 5/8/17. The staff memorandum provides staff with current information on case law, General Order updates and refresher training. SROVT is a briefing training/discussion led by a Sergeant or their designee. Any Policy or Procedural questions should be discussed with their assigned Sergeant or Lieutenant. This is the first in a series of training guides to assist in the implementation of the Prison Rape Elimination Act (PREA) and imminent Audit. Page #3 specifically states that Administrators are required and shall be making unannounced rounds at all facilities to emphasize PREA and to answer questions. These rounds shall also have to be documented for the audit.</p> <p data-bbox="240 1962 1493 2029">Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.13(c), and corrective action is required.</p> <p data-bbox="240 2051 608 2085">Corrective Action Recommended:</p> <ol data-bbox="240 2107 1278 2141" style="list-style-type: none"> 1. Agency to provide copies of Staffing Plan Reviews conducted annually since the 2018 PREA audit.

Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.

Corrective Action Completion 10/13/21:

10/13/21, PREA Compliance Manager provided Auditor with copies of the Staffing Plan Reviews for all three facilities conducted on 4/2/19, 5/18/20, 3/3/21 and 7/13/21. Each Staffing Plan review identified:

- (1) The staffing levels established pursuant to this Standard;
- (2) Prevailing staffing patterns;
- (3) The facility's deployment of video monitoring systems and other monitoring technologies; and
- (4) The resources the facility has available to commit to ensure adherence to the staffing plan.

The Staffing plan meetings included facility Commanders, PREA Compliance Managers and PREA Coordinator in attendance for each meeting and discussed any changes or adjustments made to the staffing plans. The Staffing Plan Review memorandums were provided to the Custody Captain for review

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.14 (a) thru 115.14(c): N/A - Agency reports that Claybank facility does not house youthful inmates. Facility prohibits placement of youthful inmates in housing units.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.14.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.15 (a): PREA Policy 5.041 mandates that the Sheriff's Office does not conduct cross-gender strip or cavity searches. Agency reports that over the past 12 months there have been no cross-gender strip or cross-gender visual body cavity searches of inmates or cross-gender strip or cross-gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff.</p> <p>115.15 (b): PREA Policy 5.041 mandates that cross-gender pat searches shall not be conducted inside Sheriff's Office detention facilities except in exigent circumstances. Exigent circumstances must be documented in an incident report to the Facility Commander via the chain of command for retention. This does not apply to detainees or arrestees in the field. Agency reports that the facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. Interview with random sample of 12 custody staff and 12 female inmates indicate that if female staff are not available to conduct pat-down searches of female inmates, the jail does not restrict inmates' access to programs or out-of-cell opportunities.</p> <p>115.15 (c): PREA Policy 5.041 mandates that the agency "does not conduct cross-gender pat searches, cross-gender strip or cavity searches. Exigent circumstances must be documented in writing to the facility commander and forwarded to the PREA Coordinator for file retention. This does not apply to detainees or arrestees in the field." Agency indicates that the agency does not conduct cross-gender strip or body cavity searches.</p> <p>115.15 (d): PREA Policy 5.041 mandates that limitations to opposite sex, also known as "cross-gender"viewing, and searches of inmates shall be established. Policy 3.013 Opposite Gender Supervision mandates the presence of opposite gender staff or visitors in all housing units shall be announced to the inmates, prior to staff entry. The announcement will provide appropriate warning to inmates who may be changing clothing or using the toilet. These announcements shall consist of "male on the floor" in a female housing module or unit and "female on the floor" in a male housing module or unit. The presence of opposite gender staff or visitors in areas where inmates may be strip searched and/or dressed in and/or out, such as the safety cell, intake area or inmate release area, shall be announced to the inmates, prior to staff entry. Custody staff shall not enter the shower and toilet areas, living spaces or cells of opposite gender inmates, except in exigent or emergency circumstance, and/or when accompanied by a staff member who is the same gender as the inmate. Custody staff may perform observation log checks on inmates of the opposite gender; however, the previously mentioned announcement must be made. Interview with random sample of 12 custody staff and random sample of 21 inmates indicates that officers announce their presence when entering a housing unit that houses residents of the opposite gender. This action was observed by auditor during the facility plant tour, observing both custody and medical staff entering housing units and making announcements. In addition, Agency has placed announcement imogi outside of entry doors to every housing unit and an announcement reminder.</p> <p>115.15 (e): PREA Policy 5.041 mandates that searches or examinations of a transgender or intersex inmate solely for the purpose of determining genital status are prohibited. If the status is unknown, staff should use other means to determine the person's sex, such as reviewing arrest history, available databases, available medical records, or by speaking with the individual. Agency reports that no such searches have been conducted over the past 12 months. Interviews with random sample of 16 staff and 1 transgender inmate (only transgender housed in the facility during the audit), indicates that all staff are aware of the policy prohibiting searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmates' genital status and conducting conversation with inmate or contact medical should that information be required to conduct searches. The transgender inmate indicated he has not experienced any issues regarding his gender or strip search issues. He has been treated with dignity and respect throughout his stay at the Solano CJ Claybank facility.</p> <p>115.15 (f): Agency reports that 100% of all security staff who training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs. Agency provided auditor with copies of the Guidance in Cross-Gender and Transgender Pat Searches PPT training which outlines development of skills for performing cross-gender pat searches and searches of transgender and intersex inmates per PREA Standards during exigent circumstances. Agency also provided auditor copies of all signed custody staff acknowledgements which verifies training of 34 security staff. PAQ indicates there are 34 security staff members assigned to the Claybank facility. Interview with a random sample of 16 custody staff indicates that all custody staff recieve PREA training on cross-gender pat-down searches and searches of transgender and inmates in a professional and respectful manner, both at initial PREA training and at refresher PREA training. All interviewed staff indcate they recieved their last round of refresher training in June 2020.</p>

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.15.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.16(a): Policy 13.015 Americans with Disability Accommodations establishes procedures to provide disabled inmates equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The purpose of this procedure is to provide guidelines for compliance with Title II of the Americans with Disabilities Act (ADA) for inmates and for persons having legitimate business within the detention facilities of the Solano County Sheriff's Office and Solano County Sheriff's Jail Point Book provided to assist staff communication with disabled inmates and inmates who are low functioning.</p> <p>Interview with Agency Head indicates that procedures have been established to provide inmates with disabilities and inmates who are limited English proficient equal opportunity to participate in our benefit from all aspects of the agencies efforts to prevent detect and respond to sexual abuse and sexual harassment. Agency provides inmate handbooks in multiple languages, PREA posters in multiple languages and contracted interpreter availability in multiple languages. Interview with three limited English proficient inmates indicates that they were provided inmate handbook and PREA handout in Spanish in intake and PREA video was in Spanish also.</p> <p>115.16(b): Agency has established procedures to provide inmates with limited English proficiency equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Agency provided auditor with a copy of the 5-year Masters Services Agreement between Language Line and the Solano County Sheriff's Department signed on 8/7/2018 to provide interpreter services for LEP inmates over the term of the contract.</p> <p>Interview with three limited English proficient inmates indicates that they were provided inmate handbook and PREA handout in Spanish in intake and PREA video was in Spanish also. Nursing staff uses translation services when being treated. During the PREA audit interview, a bi-lingual custody staff interpreter was utilized during the interview of all 3 inmates.</p> <p>115.16 (c): 13.015 Americans with Disability Accommodations mandates that custody staff 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 the inmate's safety, the performance of first-response duties, or the investigation of the inmate's allegations. In the past 12 months no inmate interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations. Interview with three limited English proficient inmates indicates that Interview with three limited English proficient inmates indicates that they were provided inmate handbook and PREA handout in Spanish in intake and PREA video was in Spanish also. Nursing staff uses translation services when being treated. During the PREA audit interview, a bi-lingual custody staff interpreter was utilized during the interview of all 3 inmates. Interview with random sample of 16 custody staff indicate that Agency prohibits use of the main interpreters when making allegations of sexual abuse or sexual harassment unless there's extreme edges and circumstances. Otherwise agency requires the use of contract interpreters or bilingual staff to interpret allegations of sexual abuse or sexual harassment.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.16.</p>

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.17 (a): PREA Policy 5.041 mandates that the Sheriff's Office shall not knowingly hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who:</p> <ol style="list-style-type: none"> 1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 USC1997); 2. 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; or 3. Has been civilly or administratively adjudicated to have engaged in the activity described in Paragraph A 2 above. <p>The 3 required questions for 1 inmate was not initially provided to auditor. On 9/9/21 – PREA Compliance Manager provided auditor with a memorandum dated 8/25/21 to explain that the custody staff officer who was missing the signed 3 Required Question acknowledgement in his hiring packet. The custody staff in question was hired in 5/8/17 prior to the agency having a policy in place on 11/20/17, which required the 3 Required Questions be signed before the staff member's hire date. In 2020, an internal audit of the 3 Required Questions was conducted by the agency when lack of the acknowledgement was identified. Agency remedied this issue on 8/27/20 by having the staff member sign the form and place it in his personnel file. Agency provided auditor a copy of the signed 3 Required Questions acknowledgement. Agency is compliant with the PREA Standard provision 115.17(a).</p> <p>115.17 (b): PREA Policy 5.041 mandates that incidents of sexual harassment shall be considered in determining whether to hire or promote any employee, or to enlist the services of any contractor or volunteer, who may have contact with inmates. Interview with the Human Resources (HR) Administrator indicates that policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.</p> <p>Interview with Human Resources Administrator indicates that the silly considers prior incidents of sexual harassment when determining whether to hire or promote anyone, or to Alyssa serves as a contractor may have contacted them out.</p> <p>115.17 (c): PREA Policy 5.041 mandates that before hiring, all employees who may have contact with inmates shall be subject to a criminal background check. Background checks were verified through review of 20 randomly selected staff. Review of hiring records indicate Agency is consistent with ensuring that criminal records background checks were completed prior to the staff and contractors' hire date. Consistent with Federal, State and local law, the Sheriff's Office shall make its best 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. In the past 12 months 21 people were hired who may have contact with inmates who have had criminal background records checks. 2 custody staff worked for an institutional employer before being hired to work for Solano County Jail. Letters were sent to prior institutional employers for both staff members.</p> <p>Interview with the HR Administrator indicates that criminal records background checks are consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Agency conducts full background checks on initial employee and</p> <p>Interview with Human Resourced Administrator indicates that do you still need performs criminal record background checks or considers pertinent civil or Administrative need occasions for all newly hired employees may have contact with and meets and all employees who may have contact with and employees who are considered for promotions. This includes the hiring of contractors.</p> <p>115.17 (d): PREA Policy 5.041 mandates that before hiring, all employees who may have contact with inmates shall be subject to a criminal background check. Consistent with Federal, State and local law, the Sheriff's Office shall make its best 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. In the past 12 months 21 people were hired who may have contact with inmates who have had criminal background records checks.</p> <p>PREA policy applies to all personnel of the Sheriff's Office, including employees, volunteers and independent contractors, hereafter referred to as employees. In the past 12 months 26 contracts for services where criminal background record checks were conducted on all contractors covered in the contract who might have contact with inmates. One Contractor was identified as obtaining background clearance after his hire date. On 9/9/21 the PREA Compliance Manager provided auditor with a memorandum dated 9/1/21 which indicated that the identified Contractor in question was originally cleared through backgrounds on 1/28/19. The dates originally given to the auditor for document review was for a 2 year clearance update. As of this date, the Contractor in question is no longer a contract employee, background clearance and hiring documentation is maintained in storage. On 10/13/21, PREA Compliance Manager provided Auditor with copies of the original Criminal Background FBI Clearance documentation dated 1/22/19 and signed 3 required questions documentation dated 1/14/19.</p>

Contractor was originally hired on 1/28/19.

Interview with Human Resources Administrator indicates that criminal records background checks are completed for all contractor applicants, both full time and temporary. Contractor employee background checks include clearance through CJIS (FEDERAL) and CLETS. Auditor review of 10 randomly selected contractors verified completed background check clearance through CLETS and CJIS for both temporary and full time contractors. Temporary contractors have renewed backgrounds completed every 30 days. Review of Contractor Background Clearance Checks,

115.17 (e): PREA Policy 5.041 mandates that for current employees, the agency is notified by DOJ any time the employee is fingerprinted as the result of an arrest.

Interview with Human Resources Administrator indicates that criminal records background checks are completed for all contractor applicants, both full time and temporary. Contractor employee background checks include clearance through CJIS (FEDERAL) and CLETS. Auditor review of 10 randomly selected contractors verified completed background check clearance through CLETS and CJIS for both temporary and full time contractors. Full-time contractors have background clearances completed every 2 years and temporary contractors have background completed every 30 days.

115.17(f): PREA Policy 5.041 mandates that all applicants and employees who may have contact with inmates shall be questioned directly about previous misconduct in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Every employee and volunteer has an affirmative duty to disclose misconduct. Material omissions regarding misconduct, or the provision of materially false information, shall be grounds for termination.

Interview with Human Resources Administrator and review of random selection of 10 contractor and 20 employee HR files verifies that the 3 required questions are asked prior to hire and interviews for promotions. This action was verified through signed acknowledgements for each randomly selected applicant.

115.17(g): PREA Policy 5.041 mandates that all applicants and employees who may have contact with inmates shall be questioned directly about previous misconduct in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Every employee and volunteer has an affirmative duty to disclose misconduct. Material omissions regarding misconduct, or the provision of materially false information, shall be grounds for termination.

Interview with Human Resources Administrator verifies that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

115.17(h): PREA Policy 5.041 mandates that information on substantiated allegations of sexual abuse or sexual harassment involving a former employee shall be provided to an institutional employer conducting an employment background investigation upon request unless prohibited by law.

Interview with Human Resources Administrator verifies that upon receipt of a written and signed waiver giving Agency permission to provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee to another institution, the Agency provides the documentation as requested.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.17(d), and corrective action is required.

Corrective Action Recommended:

Review of the DRAFT 4/2/19 Justice Center Detention Facility (JCDF) includes the Facility Overview, staffing on each shift, visiting, classification, inmate population, inmate programs, medical and dental services, training, PREA case statistics, staffing on each shift and a complete staffing summary.

1. Agency provided auditor with one contractor documents which indicated that the Criminal Records Background Check was conducted after his hire date. Agency was provided the name and identifying data. It was determined that the information provided was for a renewal. Auditor requires the Criminal Background FBI Clearance documentation and signed 3 required questions documentation for the 1/28/19 hire date in order to find the Agency compliant with Standard provision 115.17(d).

Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.

Corrective Action Completion 10/13/21:

On 9/9/21 the PREA Compliance Manager provided auditor with a memorandum dated 9/1/21 which indicated that the Aramark Contractor in question was originally cleared through backgrounds on 1/28/19. The dates originally given to the auditor for document review was for an update. As of this date, the Contractor in question is no longer a contract employee. On 10/13/21, PREA Compliance Manager provided Auditor with copies of the Criminal Background FBI Clearance

documentation dated 1/22/19 and signed 3 required questions documentation dated 1/14/19. Contractor was hired on 1/28/19.

The agency/facility has met the requirements of Standard provision(s) 115.17(d) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.17.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 453 237">Auditor Discussion</p> <p data-bbox="240 271 1474 331">115.18 (a): N/A - Agency indicates they have not acquired a new facility or made a substantial expansion or modification to existing facilities since since the last PREA audit which occurred in 2018.</p> <p data-bbox="240 338 1485 434">Interview with Agency Head designee and Facility Commander indicates that when designing, acquiring, or planning substantial modifications to facilities, the agency considers the effects of such changes in his ability to project it inmates from sexual abuse as a priority for both Sheriff and the County. PREA is important with regards to modification of facilities.</p> <p data-bbox="240 463 1442 524">115.18 (b): N/A - Agency indicates they have not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit which occurred in 2018.</p> <p data-bbox="240 530 1447 624">Interview with the Agency Head designee indicates that Agency uses monitoring technology to enhance the protection of inmates from incidents of sexual abuse by implementation of body worn cameras remove protection and officer accountability.</p> <p data-bbox="240 710 1334 736">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.18.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.21 (a): Agency conducts both criminal and administrative sexual abuse investigations. Agency provided Auditor with Solano County Sheriff's Office Coordinated Response and Evidence Protocol dated July 2018, specific to the Claybank Facility that agency investigators follow. There is sufficient technical detail to aid responders in obtaining usable physical evidence. The protocol has been developed using the Solano County Sheriff's Office policies and procedures as well as the National Protocol for Sexual Assault Medical Forensic Examinations from the U.S. Dept. of Justice, April 2013. Interview with random sample staff indicates they all know and understand the agencies protocol for obtaining useful physical evidence of an inmate alleged sexual abuse.</p> <p>115.21(b): N/A - Agency does not house youthful offenders. The protocol has been developed using the Solano County Sheriff's Office policies and procedures as well as the National Protocol for Sexual Assault Medical Forensic Examinations from the U.S. Dept. of Justice, April 2013.</p> <p>115.21(c): Policy 13.016 Sexual Assaults in Custody 10-20-2017 mandates that Request in-house medical staff to respond and/or escort the inmate to a medical examination room, as directed, for a medical evaluation. Medical staff may require the inmate be transported to the hospital for a forensic sexual assault examination, if appropriate. Forensic examinations are not conducted at the Agency/facility. The inmate shall be advised that there is no cost to them for any medical treatment pertaining to the assault, including the forensic medical exam. The inmate may not want to report the name of the assailant(s) or cooperate with the investigation, but he/she is, nevertheless, entitled to protection, as well as medical and mental health treatment and support services, at no cost to him/her. Napa/Solano/Marin SANE/SART Agency serves Solano County Jails and conduct all forensic examinations on victims of sexual abuse. Agency reports no forensic examinations conducted over the past 12 months. Agency reports that in the event that SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations.</p> <p>Interview with SART Team staff member at Kaiser Vallejo indicate the SART Team serves Solano County Jail. They are on-call 24/7 and provide forensic examinations. Victim advocates are allowed to be present during forensic exams with victim's permission. SART Team provides SDT prophylaxis, pregnancy information and documentation including whatever additional medical needs that are required.</p> <p>115.21 (d): Agency provided auditor with MOU with the SafeQuest Solano Dual Domestic Violence & Sexual Assault Agency which provides both sexual abuse reporting and advocacy. They respond to requests from Solano County Sheriff's Department and Solano County Jail inmates, provide SART/hospital accompaniment for current inmates at North Bay Medical Center, provide toll free telephone number for inmates who wish to report a sexual assault or harassment at Solano County Sheriff's Office facilities at no expense to the inmate. The MOU mandates both Solano County Sheriff's Department and SafeQuest maintain strict confidentiality as it relates to inmate clients. SafeQuest counselors are available 24/7. Current SafeQuest MOU effective date is 9/1/18 to 6/30/21.</p> <p>115.21 (e): Policy 5.041 PREA mandates that a victim of sexual assault has the right to a victim advocate or victim support person for both the medical examination and the investigatory process, unless the presence of the advocate or support person would be detrimental to the examination or interview, and the reason for exclusion can be properly articulated and documented. SafeQuest counselors respond to requests from Solano County Sheriff's Department and Solano County Jail inmates, provide SART/hospital accompaniment for current inmates at North Bay Medical Center, provide toll free telephone number for inmates who wish to report a sexual assault or harassment at Solano County Sheriff's Office facilities at no expense to the inmate.</p> <p>Interview with the Priya compliance manager indicates that if a rape crisis center provides victim advocate services they meet the qualifications to describe a Standard provision 115.21(d) through the SafeQuest MOU.</p> <p>115.21 (f): N/A - Agency is responsible for both administrative and criminal investigations. This standard provision does not apply.</p> <p>115.21 (g): Auditor not required to audit this Standard provision.</p> <p>115.21 (h): N/A - Agency always makes a victim advocate from a rape crisis center available to victims.</p> <p>Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.21(d), and corrective action is required.</p> <p><u>Corrective Action Recommended:</u></p>

1. Agency to provide auditor a copy of the new SafeQuest MOU to which verifies continued compliance past 6/30/21 for PREA compliance verification.

Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.

Corrective Action Completion 10/4/21:

On 10/4/21, Agency provided auditor with a copy of the MOU between Solano County Sheriff's Office and SafeQuest Solano Inc. The term of the MOU is from July 1, 2021 until June 30, 2024. SafeQuest Solano, Inc. is a nonprofit organization dedicated to providing prevention education, community training, advocacy and intervention services to those affected by domestic violence, sex trafficking, and/or sexual assault (regardless of gender identity or sexual orientation). With an emphasis on client-centered and trauma-informed care SafeQuest Solano works with diverse partners to promote individual, family and community transformation. Inmates experiencing sexual abuse or harassment may report the behavior to any correctional officer, deputy or civilian staff at their facility, or to a third party, such as a friend or family member, attorney or advocate, who may make the report for them, or by calling the sexual assault hotline at SafeQuest Solano. Inmate can also call SafeQuest toll-free from any inmate phone.

The agency/facility has met the requirements of Standard provision(s) 115.21(d) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.21.

115.22	Policies to ensure referrals of allegations for investigations
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1474 499">115.22(a): Policy 5.041 mandates all reported allegations of sexual abuse shall be thoroughly investigated, and where appropriate, criminal prosecution and/or disciplinary action shall result. Policy 13.016 Sexual Assaults in Custody mandates staff who becomes aware of sexual abuse or harassment by another staff member shall immediately report the abuse or harassment. Furthermore, all staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who report such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Failure to do so is akin to committing the act and subjects the staff member with knowledge of the act to discipline. Staff may report these acts in the following ways:</p> <ol data-bbox="240 506 727 600" style="list-style-type: none"> 1. Verbally to a supervisor or facility commander 2. In writing via memorandum to Internal Affairs 3. Verbally via telephone, to Internal Affairs <p data-bbox="240 629 1474 891">Agency reports that over the past 12 months, there have been two allegations of sexual abuse/harassment, one resulting in administration investigation and one resulting in criminal investigation. Both investigations have been completed. The two investigations received by auditor which occurred over the past 12 months were both for sexual harassment. Interview with Agency Head designee and PREA Compliance Manager indicate that there were only two PREA investigations conducted over the past 12 months and both were for sexual harassment. The reporting information in the PAQ is incorrect. Interview with the Agency Head designee indicates that the Agency insures that both administrative and criminal investigations are complete for all allegations of sexual abuse and sexual harassment by the Internal Affairs Unit and Jail Crimes Unit.</p> <p data-bbox="240 920 1474 1350">115.22 (b): Policy 5.041 PREA mandates all reported allegations of sexual abuse shall be thoroughly investigated, and where appropriate, criminal prosecution and/or disciplinary action shall result. Agency conducts both criminal and administrative investigations. Policy GO 13.016 mandates that Custody Staff will work in support of Sheriff's Office Investigations personnel to protect the victim and to preserve the scene and potential evidence associated with all PREA incidents. Sheriff's Office Investigations personnel are responsible for conducting all PREA investigations and subsequent follow-up with victim. Policy narrative is posted on the Agency website which states: The Solano County Sheriff's Office is committed to providing inmates housed at its facilities, the safest environment possible. The Solano County Sheriff's Office has a Zero- Tolerance policy toward sexual abuse and sexual harassment of any kind. Inmates who experience these types of behaviors are strongly encouraged to report the behavior, as it will be investigated thoroughly and completely, whether criminally or administratively, whichever is most appropriate. Agency documents all criminal and administrative investigations. Interviews of investigative staff indicates that Agency policy mandates that all allegations of sexual abuse or sexual harassment be referred for investigations by the Jail Crimes Unit for Criminal investigations and Internal Affairs Unit for administrative investigations.</p> <p data-bbox="240 1379 1426 1442">115.22 (c): N/A: Agency is responsible for criminal investigations. Standard provision 115.22(c) does not apply to this agency.</p> <p data-bbox="240 1471 911 1498">115.22(d): Auditor not required to audit these Standard provisions.</p> <p data-bbox="240 1527 911 1554">115.22(e): Auditor not required to audit these Standard provisions.</p> <p data-bbox="240 1644 1353 1671">Based upon the final analysis of evidence, the auditor finds the facility is not compliant with Standard 115.22(b).</p> <p data-bbox="240 1700 636 1727"><u>Corrective Action Recommendation:</u></p> <p data-bbox="240 1756 1465 1888">Agency to have policy to ensure allegations of sexual abuse or sexual harassment are referred for investigations to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency shall publish such policy on its website or, if it does not have one, make the policy available through other means. The agency shall document all such referrals.</p> <ol data-bbox="240 1917 1420 1980" style="list-style-type: none"> 1. Agency to place Policy 13.016 Sex Assaults in Custody on Agency website for public access per PREA Standard provision 115.22(b). <p data-bbox="240 2063 665 2089"><u>Corrective Action Completion 10/13/21:</u></p>

1. 10/13/21, PREA Compliance Manager informed Auditor that Policy 13.016 Sex Assaults in Custody on Agency website for public access per PREA Standard provision 115.22(b). Auditor verified this information by reviewing the Agency website. In September 2018, then-Governor Jerry Brown signed Senate Bill 978 (SB 978) into law. Effective January 1, 2020, the Commission on Peace Officer Standards and Training (POST) and each local law enforcement agency are required to "conspicuously post" on their Internet Web sites, "all current standards, policies, practices, operating procedures, and education and training materials that would otherwise be available to the public," if a request was made pursuant to the California Public Records Act (CPRA).

By making this information available and easily accessible online, the goals of SB 978 are to help educate the public about law enforcement policies, practices, and procedures, increase communication and community trust, and enhance transparency, while saving costs and labor associated with responding to individual requests for this information.

The agency/facility has met the requirements of Standard provision(s) 115.22(b) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.22.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.31(a): PREA Policy 5.041 mandates that every employee, volunteer and contractor who may have contact with inmates, including medical and mental health providers, shall be trained on the Sheriff's Office PREA policy and shall include all of the following:</p> <ol style="list-style-type: none"> 1.The zero-tolerance policy for sexual abuse, sexual misconduct and sexual harassment; 2.The right of inmates and employees to be free from sexual abuse, sexual misconduct and sexual harassment; 3.The right of inmates and employees to be free from retaliation for good faith reporting of sexual abuse, sexual misconduct and sexual harassment; 4.How an employee can fulfill the responsibilities under this policy; 5.The dynamics of sexual abuse, sexual misconduct and sexual harassment in confinement; 6.The common reactions to sexual abuse, sexual misconduct and sexual harassment in confinement settings; 7.How to detect and respond to signs of threatened and actual sexual abuse, sexual misconduct and sexual harassment; 8.How to avoid inappropriate relationships with inmates; 9.How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender or intersex inmates. 10.How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. <p>Upon implementation of this policy, all employees shall receive required training.</p> <ol style="list-style-type: none"> 1.Existing employees shall complete training within one year of policy implementation. 2.New employees shall receive training during new employee orientation. 3.Refresher training shall be provided to all employees at least every two years to ensure awareness of current agency policy and procedures. <p>The Sheriff's Office shall maintain documentation of the completion of all PREA training provided to employees, volunteers and contractors via a form that the employee must sign to acknowledge an understanding of the training received. Agency provided auditor with copy of the PREA PPT. This powerpoint meets the minimum requirements mandated by Standard provision 115.31(a). Agency provided auditor with copies of training records for 20 staff and 10 contractors. Volunteers are not allowed in the facility or contact with inmates due to COVID-19.</p> <p>Interview with Random Sample of 12 staff indicates that all staff received their initial PREA training in the Sheriff's Academy and continue with bi-annual PREA refresher training.</p> <p>115.31 (b): Claybank facility houses both male and female inmates. Staff are trained to work with all genders, no additional training is required.</p> <p>115.31 (c): Between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment. Updated policies are re-issued via email & discussed during briefings/meetings. Employees who may have contact with inmates receive refresher training on PREA requirements bi-annually. Agency provided auditor with copies of training records for 20 staff and 10 contractors. Volunteers are not allowed in the facility or contact with inmates due to COVID-19.</p> <p>Agency provided auditor with copies of PREA training records for years 2018 and 2020 for custody staff. Review of the PREA training records revealed the following results:</p> <p>Records provided by Agency verify that all custody staff received PREA training as verified through documentation provided and signed training acknowledgement letters. Annual Training verification documentation for PREA training classes conducted between 7/9/18 and 8/17/18 was provided to auditor by way of a number of signed annual course student rosters with no verification signifying comprehension of the training. Agency did not include this mandate for the training records until the year 2020. Agency also provided Annual Training verification documentation for PREA training classes conducted between 8/11/2020 and 12/3/2020 was provided to auditor by way of a number of signed annual course student rosters which provided a statement on each roster which states "By signing this the student affirms they understand the content provided in this PREA refresher course."</p> <p>115.31 (d): The agency documents that employees who may have contact with inmates understand the training they have received through employee signature or electronic verification. On 7/2/2021, the PREA Coordinator provided auditor with copies of 2008 PREA training sign-in rosters and 2020 electronic PREA education refresher verification documentation. The 2008 PREA training sign-in rosters did not include a statement that the employees understand the training they have received, however, the 2020 training sign-in rosters all possess the statement that affirms that employees understand the training they have received by signing the student rosters.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.31.</p>

115.32	<p>Volunteer and contractor training</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.32 (a): PREA Policy 5.041 mandates that every employee, volunteer and contractor who may have contact with inmates, including medical and mental health providers, shall be trained on the Sheriff's Office PREA policy. Agency provided auditor with a copy of the PREA Contractor training PPT which meets the minimum requirement mandated for the volunteers and contractors under PREA in Standard 115.32. Agency employs 49 contract staff from 2 contractor companies, TRINITY & WELLPATH cleared to work at this facility. Records provided by Agency indicates that all contract staff received PREA training as verified through documentation provided and signed training acknowledgement letters. Agency reports that no volunteers are allowed to work in the facility due to COVID restrictions since 2019. Interview with 3 Contractors indicate all 3 have been trained in PREA responsibilities and understand their responsibilities in the event of a PREA violation of sexual abuse or harassment. Volunteers are not allowed in the facility due to COVID.</p> <p>115.32 (b): Agency indicates that the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. PREA Policy 5.016 mandates that all volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Copy of PREA Contractor training PPT provided by the Agency supports that claim. Agency reports that no volunteers are allowed to work in the facility due to COVID restrictions since 2019. Agency employs 49 contract staff from 2 contractor companies, TRINITY & WELLPATH cleared to work at this facility. Interview with 3 Contractors the training consists of zero tolerance, who to report to, identifying sexual-harassment and report to supervisor and sergeant on duty, report report to Apria coordinator or Sergeant when a report comes in office. Provides inmate safety and security until custody staff arrives. Training also include zero tolerance, sex abuse, how to report, and observing signs of abuse. Volunteers are not allowed in the facility due to COVID.</p> <p>115.32 (c): PREA Policy 5.014 mandates that "The Sheriff's Office shall maintain documentation of the completion of all PREA training provided to employees, volunteers and contractors via a form that the employee must sign to acknowledge an understanding of the training received." Agency provided auditor with copies of signed acknowledgement letters for all 42 contractors assigned to work in the Claybank facility. Each of the acknowledgement letters stated that the contractor/volunteer understood the training they had completed. 10 of the contractors were randomly selected for the Training Records Worksheet and verified that they obtain their PREA training prior to or on their hire date.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.32.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 208 451 235">Auditor Discussion</p> <p data-bbox="240 271 1485 696">115.33 (a): PREA Policy 5.041 mandates that, "During the intake process, an inmate shall receive information explaining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Written information shall also be provided in the form of the Inmate General Information Custody Division Rules and Disciplinary Penalties for the Solano County Sheriff's Office Detention Facilities." Agency states that 487 (100%) of inmates admitted during the past 12 months were given the above information at intake. Agency provided auditor with intake documents from 24 inmates who were randomly selected by auditor, and were admitted into the facility between 2020 and 2021. All inmates received their initial PREA training in intake date and comprehensive education within 30 days of intake. Agency provided auditor with copies of signed PREA Comprehensive Education verification sheets. Inmates have the opportunity to ask the Classification officer with any PREA questions, view the "PREA: What You Need to Know" video in the housing unit, provided the "End the Silence" Brochure, Rule Book with PREA information as well as outside reporting telephone numbers (pages 27-29 in the rule book), receive explanation of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment, and information explaining how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p data-bbox="240 703 1477 831">Interview with intake staff indicates they ensure the current inmates as well as those transferred from other facilities have been educated on the agency zero tolerance policy on sexual abuse of sexual harassment by ensuring they are informed at intake and transferred to other facilities regarding the zero tolerance policy. Interview of a random sample of 21 inmates indicates that they received zero tolerance education at intake.</p> <p data-bbox="240 864 1493 1055">115.33 (b): Agency reports that 487 inmates were admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake. Retaliation protection is outlined in the inmate handbook and the PREA Brochure provided to each inmate at intake. Signed PREA Comprehensive Education verification sheet also has Retaliation understanding acknowledged by each inmate during intake.</p> <p data-bbox="240 1061 1493 1189">Review of inmate intake documentation verifies education of inmate rights including retaliation for reporting sexual abuse or sexual harassment. Intake file review of 24 randomly selected inmate documentation (14 female & 10 male) indicates comprehensive education through PREA video provided in the housing unit after intake classification review within 30 days of intake .</p> <p data-bbox="240 1196 1477 1323">Interview with intake staff indicates they ensure the current inmates as well as those transferred from other facilities have been educated on the agency zero tolerance policy on sexual abuse of sexual harassment by ensuring they are informed at intake and transferred to other facilities regarding the zero tolerance policy. Interview of a random sample of 21 inmates indicates that they received zero tolerance education at intake.</p> <p data-bbox="240 1357 1485 1485">115.33 (c): Agency reports that all inmates received PREA education at time of original booking, and via video education. PREA Policy 5.041 mandates that "Refresher information shall be provided to all inmates at least annually and whenever an inmate is transferred to a different facility to ensure that education pertaining to the current policies and procedure has been provided."</p> <p data-bbox="240 1491 1493 1619">Review of inmate intake documentation verifies education of inmate rights including retaliation for reporting sexual abuse or sexual harassment. Intake file review of 24 randomly selected inmate documentation (14 female & 10 male) indicates comprehensive education through PREA video provided in the housing unit after intake classification review within 30 days of intake .</p> <p data-bbox="240 1626 1477 1720">Interview with intake staff indicates they ensure the current inmates as well as those transferred from other facilities have been educated on the agency zero tolerance policy on sexual abuse of sexual harassment by ensuring they are informed at intake and transferred to other facilities regarding the zero tolerance policy.</p> <p data-bbox="240 1753 1485 2107">115.33 (d): PREA Policy 5.041 mandates that "Appropriate provisions shall be made to ensure effective education for inmates who are not fluent in English, are hearing impaired, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. In addition, key information shall be continuously and readily available or visible to inmates through posters, pamphlets or other written formats." Inmates are provided with PREA brochure titled "End The Silence", and copy of the inmate Rule Book (in either Spanish or English). PREA videos shown in each housing unit incorporates closed caption and is played every Thursday in all housing units as verified through facility physical plant review and inmate interviews. Intake and medical provides access to contract interpreters and Point-Book to communicate with disabled inmates. Review of inmate education materials verify compliance with this PREA Standard provision. Policy 13.015 Custody Procedure, Americans with Disability Accommodations mandates that Inmates identified as hearing impaired, sight impaired or others who may need individualized assistance, including evacuation in the event of an emergency, will be identified with a green movement card and an ADA identification vest.</p> <p data-bbox="240 2114 1477 2143">Agency reports that no disabled inmates are housed at the Claybank facility except for Limited English Proficient Inmates as</p>

was verified during the onsite audit by the auditor. Custody staff will make every attempt to ensure that hearing-impaired inmates will be provided with the equipment necessary to communicate effectively.

a. A portable TTY/TDD machine is available upon request in Booking. Each module/unit has an amplified telephone available for inmate use.

b. A permanent record will be maintained in the inmate's JMS file documenting his/her use of the portable TTY/TDD machines. The housing officer shall enter the inmate's usage of the portable TTY/TDD machine in the inmate's Phone History located within JMS.

c. One portable TTY/TDD machine shall be assigned to each facility. When not in use, the portable TTY/TDD machine shall be stored within the floor sergeant's office.

d. Each Facilities Officer shall conduct a monthly inspection of all portable TTY/TDD machines to verify they are in condition and good working order and shall document the inspection and findings within JMS.

Custody staff will make every attempt to identify and track hearing- and sight-impaired inmates to ensure they are provided with the equipment and/or services necessary to achieve effective communication. a. Every effort will be made to provide blind and deaf inmates with a tactile interpreter when necessary to communicate effectively.

b. When detention staff is unable to communicate with an inmate who is blind and deaf, the following individuals will be notified in a timely manner: The on-duty watch commander, the ADA Division Representative, and the Facility Commander.

Custody staff 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 the inmate's safety, the performance of first-response duties, or the investigation of the inmate's allegations.

115.33 (e): The agency maintains documentation of inmate participation in PREA education sessions. Upon request, Agency provided auditor with randomly selected individual inmate intake forms to include forms verifying inmate PREA training.

115.33 (f): Policy 5.041 PREA mandates key information be continuously and readily available or visible to inmates through posters, pamphlets or other written formats. Review of physical plant indicates PREA posters are posted inside each housing unit between inmate phones and in general areas of the facility with access to both inmates and staff. The posters provide inmates with Zero-Tolerance and reporting information to include contact numbers to outside reporting agencies and informing inmates that these numbers are confidential, toll free, not monitored and provides limits of confidentiality. Inmates are being provided the "End The Silence" pamphlet during intake. PREA video is played daily in each housing unit in both English & Spanish.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.33.

115.34	<p>Specialized training: Investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.34(a): PREA Policy 5.041 mandates that "In addition to general training provided to all employees, the Sheriff's Office shall ensure that investigators receive documented training in sexual abuse investigations in confinement settings." Verification documentation is found in provision 115.34(c). Interview with two criminal investigators indicate they both have completed the NIC training and are certified to conduct criminal investigations in a confinement setting. Interview with two Administrative Investigators (IA) indicate they conduct administrative investigations to determine if staff followed policy and administrative mandates set forth by both PREA and the Agency. Internal Affairs (IA) investigators do not conduct conduct criminal investigations. IA investigations are tolled until the criminal investigation is completed. They can utilized the criminal investigators to assist with the Administrative documentation and interviews gleaned from the criminal cases to conduct the administrative investigation.</p> <p>115.34 (b): Investigators receive specialized training through the National Institute of Corrections and include training on 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. Interview with two criminal investigators indicate they both have completed the NIC training and are certified to conduct criminal investigations in a confinement setting. Interview with the two criminal investigators indicate the NIC training included Miranda & Garrity warnings, evidence colletcion in a confinement setting, obtaining evidence required to substantiate a case for administrative action or prosecution.</p> <p>115.34 (c): The agency maintains documentation showing that investigators have completed the required training. Agency indicates that the number of investigators currently employed who have completed the required training is 108. Agency provided auditor with copies of the National Institute of Corrections NIC certifications for 136 staff currently trained to conduct Sexual Abuse Investigations in a Confinement Setting. This training is provided to all custody staff in addition to the mandated initial PREA Training and bi-annual PREA Refresher Training.</p> <p>115.34 (d): N/A - Auditor is not required to audit this provision</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.34.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.35 (a): PREA Policy 5.041 mandates that "This policy applies to all inmates and personnel of the Sheriff's Office, including employees, volunteers and independent contractors, hereafter referred to as employees. Every Sheriff's Office employee, contractor and volunteer who has direct contact with inmates, either within or outside of the facility, but within a custodial setting, shall be trained in the detection of and mandatory reporting processes related to sexual abuse."</p> <p>"Every employee, volunteer and contractor who may have contact with inmates, including medical and mental health providers, shall be trained on the Sheriff's Office PREA policy and shall include all of the following:</p> <ol style="list-style-type: none"> 1. The zero-tolerance policy for sexual abuse, sexual misconduct and sexual harassment; 2. The right of inmates and employees to be free from sexual abuse, sexual misconduct and sexual harassment; 3. The right of inmates and employees to be free from retaliation for good faith reporting of sexual abuse, sexual misconduct and sexual harassment; 4. How an employee can fulfill the responsibilities under this policy; 5. The dynamics of sexual abuse, sexual misconduct and sexual harassment in confinement; 6. The common reactions to sexual abuse, sexual misconduct and sexual harassment in confinement settings; 7. How to detect and respond to signs of threatened and actual sexual abuse, sexual misconduct and sexual harassment; 8. How to avoid inappropriate relationships with inmates; 9. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender or intersex inmates. 10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities." <p>Interview with medical and mental health staff indicates that they are certified to treat sex offenders who trained on how to preserve physical evidence and sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and who to report allegation sexual abuse and suspicions of sexual abuse and sexual harassment.</p> <p>115.35 (b): Agency medical staff at this facility do not conduct forensic medical exams. Forensic medical exams are conducted at an outside hospital.</p> <p>Interviews of medical and mental health staff verify they do not conduct forensic medical examinations at the facility.</p> <p>115.35 (c): Agency provided auditor with signed copies of 26 PREA Acknowledgements of Medical practitioner training. Agency reports Medical staff are contractors and follow the same training provided to Contractors and Volunteers.</p> <p>115.35 (d): PREA Policy 5.041 mandates that "This policy applies to all inmates and personnel of the Sheriff's Office, including employees, volunteers and independent contractors, hereafter referred to as employees. Every Sheriff's Office employee, contractor and volunteer who has direct contact with inmates, either within or outside of the facility, but within a custodial setting, shall be trained in the detection of and mandatory reporting processes related to sexual abuse."</p> <p>"Every employee, volunteer and contractor who may have contact with inmates, including medical and mental health providers, shall be trained on the Sheriff's Office PREA policy and shall include all of the following:</p> <ol style="list-style-type: none"> 1. The zero-tolerance policy for sexual abuse, sexual misconduct and sexual harassment; 2. The right of inmates and employees to be free from sexual abuse, sexual misconduct and sexual harassment; 3. The right of inmates and employees to be free from retaliation for good faith reporting of sexual abuse, sexual misconduct and sexual harassment; 4. How an employee can fulfill the responsibilities under this policy; 5. The dynamics of sexual abuse, sexual misconduct and sexual harassment in confinement; 6. The common reactions to sexual abuse, sexual misconduct and sexual harassment in confinement settings; 7. How to detect and respond to signs of threatened and actual sexual abuse, sexual misconduct and sexual harassment; 8. How to avoid inappropriate relationships with inmates; 9. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender or intersex inmates. 10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities." <p>Agency provided auditor with signed copies of 26 PREA Acknowledgements of Medical practitioner training for those assigned to the facility..</p> <p>Wellpath PREA PnP - 3-1 Policy states that additional training is provided by Wellpath practitioner which includes, but not limited to:Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.35.</p>

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.35.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.41 (a): "Policy 18.001 mandates All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or for being sexually abusive toward other inmates." Interview with Staff responsible for risk screening indicates inmates are provided intake screening and upon transfer to another facility for risk of being sexually abused by other inmates or abusive towards other inmates. The PREA screening process did not begin until 5/31/17. Interview of Random Sample of 24 inmates selected from facility housing roster indicates only 21 inmates admitted to receiving initial screening at intake. Review of 24 randomly selected screening files from facility housing roster indicated that all received initial screening within 72 hours of intake and signed statement of acknowledgement for PREA Education as verified by auditor observing the screening process during intake and classification. Inmates are initially screened at the Solano County Main Facility, then transferred to the Claybank facility where the screening process is reviewed and provided PREA Education for the second time.</p> <p>115.41 (b): Policy 18.001 PREA Requirements mandate that "All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or for being sexually abusive toward other inmates." "All inmates shall be screened within 24 hours of arrival for potential vulnerabilities to become victimized or tendencies of acting out with sexually aggressive behavior." Policy #17.002 Reception and Orientation mandates that all inmates shall be provided an orientation within 72 hours after arrival. Inmates shall be provided with information on how to ensure their safety, including sexual safety. Inmate orientation will be provided upon initial housing and continued education information videos (PREA), will be shown in each housing module/unit. In addition to the videos, inmates will receive a copy of the Inmate Rules and Regulations rule Book available in English, Spanish and Braille. PAQ indicates that 487 inmates entering the facility (either through intake or transfer-due to COVID) whose length of stay in the facility was for 72 hours or more who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility. The PREA screening process did not begin until 5/31/17. Interview of Random Sample of 21 inmates selected from facility housing roster indicates 21 inmates admitted to receiving initial screening at intake. Review of 24 randomly selected screening files from facility housing roster indicated that all received initial screening within 72 hours of intake and signed statement of acknowledgement for their PREA Education. Agency reports that 487 inmates have entered the facility within the last 12 months, whose length of stay in the facility was for 72 hours or more and who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility. Review of 14 female and 10 male inmates randomly selected by the auditor, who entered the facility within past 12 months, were all screened within 24 hours of intake.</p> <p>115.41 (c): Agency provided auditor with copies of the objective screening instrument, from the 24 randomly selected inmates, used to document the objective screening criteria used to assess an inmate's risk of sexual victimization: "All inmates shall be screened within 24 hours of arrival for potential vulnerabilities to become victimized or tendencies of acting out with sexually aggressive behavior. Additionally, the following criteria shall be used to assess an inmate's risk of sexual victimization:</p> <ul style="list-style-type: none"> a. Mental, physical or developmental disabilities b. Age c. Physical stature d. Previous incarceration e. Nonviolent criminal history f. Prior convictions for sex offenses g. If the inmate is perceived to be, or admits to being gay, lesbian, bisexual, transgender, intersex or gender nonconforming h. Previous sexual victimization i. The inmate's perception of vulnerability j. An inmate's request to be segregated <p>Agency provided Auditor with PREA Classification Objective Screening form and the PREA Comprehensive Education form. The screening instrument includes 9 of the 10 PREA mandated minimum screening criteria questions. Item 10 has been removed as Agency/facility does not house inmates solely for immigration purposes. The instrument is weighted, scored and provides area for override explanation by Classification reviewer.</p> <p>The PREA Comprehensive Education form is an acknowledgement signed by inmate and classification officer to verify that the inmate viewed the PREA video, understands zero-tolerance policy, understand sexual abuse/harassment definitions, right to report sexual abuse through multiple channels and get help from trained medical and mental health care professionals, understanding that sexual activity between a staff member and inmate can never be consensual and is against the law, that the inmate has the right to be protected from sexual abuse, receipt of the End the Silence Brochure and Inmate Rule Book, and acknowledges that the Classification officer has answered PREA related questions posed by the inmate.</p>

Form is signed and dated both by inmate and Classification officer.

115.41 (d): Policy #18.001 Custody Procedures mandates that, "All inmates shall be screened within 24 hours of arrival for potential vulnerabilities to become victimized or tendencies of acting out with sexually aggressive behavior. Additionally, the following criteria shall be used to assess an inmate's risk of sexual victimization:

- a. Mental, physical or developmental disabilities
- b. Age
- c. Physical stature
- d. Previous incarceration
- e. Nonviolent criminal history
- f. Prior convictions for sex offenses
- g. If the inmate is perceived to be, or admits to being gay, lesbian, bisexual, transgender, intersex or gender nonconforming
- h. Previous sexual victimization
- i. The inmate's perception of vulnerability
- j. An inmate's request to be segregated

Interview with the screening staff indicates that the initial risk screening considers topics such as inmate's age, size, history of domestic violence charges, previous incarceration, charges of sexual abuse and LGBTI status. Initial screening process includes a checklist of 15 questions which results in a point system for risk screening assessment.

Policies #18.001 and #17.002 does not include required criteria for Standard provision 115.41(d) which mandates Agency consider whether the inmate is detained solely for civil immigration purposes as Agency/facility does not house inmates solely for immigration purposes PREA Screening Supplemental Questionnaire does not provide response or answer the question if inmate is detained solely for civil immigration purposes. The current PREA Screening Supplemental Questionnaire form includes all 10 criteria as outlined in Standard provision 114.41(d). Interview with staff responsible for risk screening indicate the inmate responds to a number of PREA questions on the Sexual Predator/Vulnerability PREA Screening Checklist and the screening staff completes the form with their observations. There is scoring designation and Predator override area on the form. The screening officer has the opportunity to include an explanation for each question that has a "YES" answer.

115.41 (e): 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. Policy 18.001 Custody Procedure mandates that "Risk of Abusiveness - In assessing inmates for risk of being sexually abusive, Classification officers shall consider the following:

1. Prior acts of sexual abuse
2. Prior convictions for violent offenses
3. History of prior institutional violence or sexual abuse"

Victimization Risk - Within 30 days of arrival, or if any additional information is received that bears on an inmate's risk of sexual victimization or abusiveness, an inmate's risk level for sexual assault or abusiveness shall be reassessed.

Interview with Risk Screening staff indicates that the initial risk screening considers topics such as inmate's age, size, history of domestic violence charges, previous incarceration, charges of sexual abuse and LGBTI status. Initial screening process includes a checklist of 15 questions which results in a point system for risk screening assessment.

115.41(f): Policy 18.001 Custody Procedure mandates that "Victimization Risk - Within 30 days of arrival, or if any additional information is received that bears on an inmate's risk of sexual victimization or abusiveness, an inmate's risk level for sexual assault or abusiveness shall be reassessed." Agency indicates that 487 inmates have entered the facility within the past 12 months whose stay was for 30 days or more and reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility. Auditor reviewed the screening records of 14 female and 10 male (24) inmates , randomly selected by auditor, who entered the facility over the past 12 months. All selected inmates had been reassessed within 30 days from the date of intake.

Interview with a random sample of 21 inmates and review of 24 screening files verifies that only 19 inmates recall receiving any type of a 30-day reassessment as inmates are interviewed for the reassessments if there was additional information that was discovered or the Classification officer needs additional information. Document review indicated that all inmates selected for document review had their reassessments completed within 30-days of intake.

Interview with risk screening staff indicates that administratively separated inmates are assessed are initially assessed every 7 days and general population inmates are assessed every 30 days, as verified through document review.

115.41 (g): Policy 18.001 Custody Procedure mandates that "Victimization Risk - Within 30 days of arrival, or if any additional information is received that bears on an inmate's risk of sexual victimization or abusiveness, an inmate's risk level for sexual assault or abusiveness shall be reassessed." Agency indicates that 487 inmates have entered the facility within the past 12 months whose stay was for 30 days or more and reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility. Auditor reviewed the screening records of 14 female and 10

male (24) inmates , randomly selected by auditor, who entered the facility over the past 12 months. All selected inmates had been reassessed within 24 hours from the date of intake.

Interview with risk screening staff indicates that administratively separated inmates are assessed are initially assessed every 7 days and general population inmates are assessed every 30 days, as verified through document review.

115.41 (h): Policy 18.000 Classification Intake Process mandates that "If, during the interview process, an inmate refuses to answer questions, including those which may pertain to a disability, sexual orientation, past victimization, or their own perception of vulnerability for abuse, he or she shall not be subject to any discipline for failing or refusing to answer. " Interview with staff responsible for risk screening indicates inmates are not disciplined for refusing to respond to PREA questions.

115.41 (i): Policy 18.001 Custody Procedure mandates that "All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or for being sexually abusive toward other inmates. Any information provided by the inmate is confidential and will be released on a need-to-know basis."

Policy 18.000 mandates the Classification Officer shall interview each new inmate in an area suitable for a confidential interview. The Classification Officer shall utilize all necessary information using the interview questionnaire, Automated Tracking and Inmate Management System (ATIMS), CLETS, ARIES and other pertinent information to classify an individual.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.41.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.42 (a): Policy 18000 Custody Procedure Classification Intake Process mandates that "As part of the classification process, each new inmate will be screened within 24 hours for potential vulnerabilities or tendencies to act out with sexually aggressive behavior. Housing assignments, work assignments and programming/education assignments will be made accordingly. Inmates identified as at risk for sexual victimization, or with tendencies to act out with sexually aggressive behavior, will be assessed by Mental Health personnel." Interview with PREA Compliance Manager indicates that information from the risk screening during intake is utilized to assess safety and security for inmates under their control and determines the best housing unit situation for each inmate. Risk screening staff indicates that the information is used to analyze information from screening for housing and programming to properly separate victims in aggressors.</p> <p>115.42 (b): Policy 18000 Custody Procedure Screening Process mandates that "All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or for being sexually abusive toward other inmates. Any information provided by the inmate is confidential and will be released on a need-to-know basis. The safety of each inmate shall be determined on an individualized basis." Agency provided auditor with a copy of the Classification PREA Screening Checklist which provides Possible Victim Factors for response from inmates and Classification, outlined in Standard provision 115.41. Interview with Classification staff indicates that the information is used to analyze information from screening for housing and programming to properly separate victims in aggressors.</p> <p>115.42 (c): Policy 18000 Custody Procedure Transgender Inmates mandates that :</p> <ol style="list-style-type: none"> 1. Transgender inmates shall be treated the same as other inmates and provided the same opportunities for programs within the facility. 2. Information gathered during the intake process shall be used to assist the Classification officer in making a decision on where to house the inmate. The decision will take into consideration the inmate's health and safety, as well as management and/or security issues. All decisions shall be made on a case-by-case basis. 3. Housing assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threat to safety experienced by the inmate. Consideration shall be given to the inmate's own views with respect to his/her own safety when making housing assignments. <p>Interview with the PREA Compliance Manager indicates housing and programming assignments for transgender or six inmates is determined through the classification process the agency considers whether the place or will ensure the inmates health and safety and also considers whether placement will present a management or security danger. Interview with the PREA Facility Compliance Manager and the one Transgender inmate House at the Claybank facility both agree that the agency makes individual housing in programming assignments for each transgender inmates on a case by case basis. Auditor's review of the classification process and intake while conducting the on-site audit review at the Main Jail Intake process verifies that claim.</p> <p>115.42 (d): Policy 18000 Custody Procedure Transgender Inmates mandates that "Housing assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threat to safety experienced by the inmate. Consideration shall be given to the inmate's own views with respect to his/her own safety when making housing assignments." Agency indicates that there have been no Transgender inmates in custody for 6 months or longer at the Claybank Facility. Interview with PREA Compliance Manager & Risk Screening staff indicates that all inmates are reassessed every 30 days except inmates classified as administrative separation, who are reviewed every 7 days.</p> <p>115.42 (e): Policy 18000 Custody Procedure Transgender Inmates mandates that "Consideration shall be given to the inmate's own views with respect to his/her own safety when making housing assignments." Interview with PREA Compliance Manager and Risk Screening staff indicates that transgender and intersex inmates views with respect to his or her and safety is given serious consideration in placement and programming assignment. Interview with the 1 transgender inmate housed at the Claybank facility during the onsite audit agrees with that assessment as she has experience no problems regarding housing assignments. He feels safe at the Solano County Jail.</p> <p>115.42 (f): Facility provides inmates with individual showers which are have either film on the windows and/or medical shields which does not allow cross-gender viewing by staff or inmates. Interview with the Apria compliance manager, staff responsible for risk screening, and the one trans gender inmate assigned to the Claybank facility all agree that transgender inmates are given the opportunity shower separately from other inmates. The ClayBank facility have individual showers with curtains in each housing unit. Physical plant review verifies the physical layout of the showers in the facility.</p>

115.42 (g): Physical plant review to include interviews with PREA Coordinator and PREA Compliance Manager verify that Solano County Jail facilities do not possess dedicated facilities or wings for LGBTI inmates.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.42.

115.43	Protective Custody
Auditor Overall Determination: Exceeds Standard	
Auditor Discussion	
<p>115.43 (a): Policy 18.001 Custody Procedure Protective Custody mandates that "Inmates at high risk for sexual victimization shall not be placed 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." Agency reports that 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.</p> <p>Interview with Facility Commander indicates placing inmates in involuntary housing is the last resort to provide inmate with a safe environment. Inmates placed in involuntary segregated housing for risk of sexual abuse shall not be housed there for more than 24 hours before alternative housing is made available.</p> <p>115.43 (b): 115.43 (a): Policy 18.001 Custody Procedure Protective Custody mandates that "Inmates placed in segregated housing for their safety shall have access to programs, privileges, education, and work opportunities to the extent possible. If access to the preceding is limited, the following shall be documented in JMS:</p> <ol style="list-style-type: none"> The opportunities limited The duration of the limitation The reasons for the limitation <p>"Placement into involuntary segregation shall include the following documentation in JMS:</p> <ol style="list-style-type: none"> The reason pertaining to the concern for the inmate's safety Why there are no alternatives" <p>Every 30 days, a review for the continuing need for separation from general population will be conducted and documented in the Jail Management System (JMS)."</p> <p>For inmates who are housed over 30 days on an involuntary basis, the following shall be documented in JMS:</p> <ol style="list-style-type: none"> The concern for the inmate's safety The reason for no alternative means of separation <p>Every 30 days, a review for the continuing need for separation shall be performed and documented Jail Management System (JMS)."</p> <p>Interview with staff who supervise inmates in segregated housing indicates that if inmates were involuntarily housed in segregated housing, it would be for a very short time, no longer than 24 hours. Privileges would not be limited and they would have full access to commissary, out of cell opportunities when available. Anytime programs are restricted it would be documented.</p> <p>115.43 (c): Agency reports that in the past 12 months, the no inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement.</p> <p>Interview with Facility Commander indicates any inmate housed in administrative separation for risk of sexual victimization or alleging sexual abuse is housed there for a very short period of and status review conducted by Classification regularly. Reviews are documented in the Classification Notes. California Code Title 15 mandates inmates held in administrative segregation be reviewed within 30 days to determine and document if continued placement is required. Interview with Staff who Supervise Inmates in Segregated Housing indicate inmates classified as Administrative Separation (AdSep) are reviewed every 7 days which exceeds PREA Standards. There were no inmates housed in segregated housing who is at risk for sexual victimization.</p> <p>115.43 (d): Agency reports that in the past 12 months, the no of inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement.</p> <p>115.43 (e): Policy 18.001 PREA Requirements mandates that "Every 30 days, a review for the continuing need for separation shall be performed and documented in the Jail Management System (JMS)."</p> <p>Interview with Facility Commander indicates any inmate housed in administrative separation for risk of sexual victimization or alleging sexual abuse is housed there for a very short period of and status review conducted by Classification regularly. Reviews are documented in the Classification Notes. California Code Title 15 mandates inmates held in administrative segregation be reviewed within 30 days to determine and document if continued placement is required. Interview with Staff who Supervise Inmates in Segregated Housing indicate inmates classified as Administrative Separation (AdSep) are reviewed every 7 days which <u>exceeds</u> PREA Standards. There were no inmates housed in segregated housing who is at risk for sexual victimization.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.43.</p>	

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1474 432">115.51 (a): Policy PREA 5.041 mandates that "An inmate may report sexual abuse, sexual misconduct, 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 an incident of sexual abuse by any employee, volunteer or contractor. Reports may be made in numerous ways, to include numerous ways for inmates to report abuse or harassment to a public or private entity or office not part of this agency:</p> <ol data-bbox="240 439 1484 667" style="list-style-type: none"> 1. In person to any staff member, including medical and/or mental health professionals; 2. Third party reporters, such as a friend or family member, may report on behalf of the inmate. Information on reporting methods shall be distributed on the Solano County Sheriff's Office web site; 3. In writing in the form of an emergency grievance, inmate request or medical request; 4. In writing to the Solano County Sheriff's Office Investigations Bureau or Administrative Investigations Unit; or 5. By contacting the Rape, Abuse and Incest National Network (RAINN) at 1-800-656-HOPE, or other toll free Rape Hotline or Victim Advocate." <p data-bbox="240 696 1493 790">Policy 13.016 Sexual Assaults in Custody mandates that "All inmates who are victims of sexual assault will be referred to the jail medical staff for evaluation and referral for services. All sexual assaults will be investigated in accordance with General Order 5.041."</p> <p data-bbox="240 797 1436 860">Inmate Reporting: Inmates who believe they are victims, may report sexual abuse or sexual harassment in the following ways:</p> <ol data-bbox="240 889 1493 1910" style="list-style-type: none"> 1. To any custody staff member. 2. To any civilian staff member, including medical staff, mental health staff, clergy, program staff, contractor, volunteer etc. 3. To any third party, including, but not limited to, an agency not affiliated with the Solano County Sheriff's Office, such as the Safequest Sexual Assault Crisis line, which any inmate can access by dialing #93 on any inmate telephone available 24 hours a day. These lines are not recorded and reports are confidential at the inmate's request. Signage shall be posted advising inmates that such calls are not monitored. Inmates may also call Safequest Sexual Assault Hotline (707) 422-7345. Inmates who have been assaulted may request anonymity at any time. Trained crisis line workers will answer the calls and have the capability to arrange three-party conference calls with a translator or social worker. 4. Inmates may also report sexual harassment or abuse via inmate request card and/or inmate medical request card, grievance, letter or any other medium. 5. Staff shall accept all forms of reports, to include, but not limited to; verbally, in writing, anonymous and from third parties. All reports shall be documented without delay, regardless of whether or not the inmate requests to remain anonymous. 6. Staff members reporting sexual abuse, assault, or harassment, by another staff member, should report it to their immediate supervisor and may do so privately if necessary. 7. If an inmate calls the Sexual Assault Crisis number on an inmate telephone, the representative from the crisis center will notify the facility commander. The representative will advise if the report is anonymous or not. Anonymous reports will only have limited information, which shall be documented in an Incident Report and forwarded to the PREA manager at the facility. 8. Mental Health professionals assigned within Solano County jail facilities may also perform some of the above services for the inmate, if the inmate does not wish to contact the Sexual Assault Center. If an inmate reports an assault to mental health, as a mandated reporter, the staff member is required to report the assault to the Sheriff's Office. An appropriate investigation will immediately commence. The on-site Mental Health staff will handle all necessary follow-up care at the facility. 9. Jail medical and mental health professionals are required to inform inmates of their duty to report, and the limitations of confidentiality at the initiation of any services provided. <p data-bbox="240 1939 1493 2067">Interview with 12 random staff indicates inmates can randomly report sexual abuse or sexual harassment to SafeQuest, letter to the Sheriff, random staff, put in a grievance, or report to medical or mental health staff. Interview with random sample of inmates in case they would report sexual abuse or sexual harassment by way of grievance, request slip, staff, or the SafeQuest hotline.</p> <p data-bbox="240 2096 1493 2157">115.51 (b): Policy 13.016 Sexual Assaults in Custody mandates that "Inmates are provided at least one way for inmates to report abuse or harassment through an office that is not part of the Agency, such as Safequest Sexual Assault crisis Hotline.</p>

The Safequest Sexual Assault Crisis line, which any inmate can access by dialing #93 on any inmate telephone available 24 hours a day. These lines are not recorded and reports are confidential at the inmate's request. Signage shall be posted advising inmates that such calls are not monitored. Inmates may also call Safequest Sexual Assault Hotline (707) 422-7345. Inmates who have been assaulted may request anonymity at any time. Trained crisis line workers will answer the calls and have the capability to arrange three-party conference calls with a translator or social worker. "

Policy 14.008 Foreign National, Consulate Notification mandates that inmates who have been detained solely for civil immigration purposes are provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security. "In accordance with federal law and the provisions of PC834c, upon arrest and booking, or detention for more than two hours, of a known or suspected foreign national, booking authorities shall advise the foreign national that he or she has a right to communicate with an official from the consulate of his or her country. If the foreign national chooses to exercise that right, the booking authority shall ensure that his or her consulate is notified."

Interview with PREA Compliance Manager indicates that and Weitz at least one way for inmates to report abuse or harassment or a private entity that is not part of the agency, safe quest. Use of Safequest enables the immediate transmission of the meet reports of sexual abuse and sexual response to agencies ABC officials that allow the inmate to remain anonymous upon request. Report on sexual abuse and sexual harassment with SafeQuest advocates over the phone they are require ask inmate if they wish to remain anonymous or if they can share the reporting information with the agency. Interview with Random Sample of 16 inmates indicates that indicates that if it makes head to report any sexual abuse or sexual arrestment that happened to them they would report through the grievance process request slip through medical or mental health report to staff or the PREA hotline. All inmates interviewed indicate that they are allowed to make a report anonymously without retaliation. The Safequest MOU expired in 6/30/2021. Auditor awaits updated MOU to verify compliance with this Standard provision.

115.51 (c): Policy 13.016 Sexual Assaults in Custody mandates that "Staff shall accept all forms of reports, to include, but not limited to; verbally, in writing, anonymous and from third parties. All reports shall be documented without delay, regardless of whether or not the inmate requests to remain anonymous."

Interview with a random sample of 12 staff indicates that staff are mandated through policy to except reports of sexual abuse of sexual harassment me verbally, in writing, anonymously, and from third parties.

Interview with a random sample of 16 inmates indicates they can make a report of sex abuse or sexual harassment in writing or through a close friend or relative without having to give their name. They are aware that they can make a report anonymously.

115.51 (d): Policy 13.016 Sexual Assaults in Custody mandates that "If an inmate calls the Sexual Assault Crisis number on an inmate telephone, the representative from the crisis center will notify the facility commander. The representative will advise whether the report is anonymous or not. Anonymous reports will only have limited information, which shall be documented in an Incident Report and forwarded to the PREA Compliance Manager at the facility. Staff members reporting sexual abuse, assault, or harassment, by another staff member, should report it to their immediate supervisor and may do so privately if necessary."

Interview with a random state sample of 12 staff indicates that they can privately report sexual abuse and sexual-harassment of inmates through Safe quest, medical, Mental Health and Human Resources. Staff are informed of these procedures by way of bi-annual training and email update notification.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.51(b), and corrective action is required.

Corrective Action Recommended:

1. Agency to provide auditor a copy of the new SafeQuest MOU to which provides an advocacy agreement past 6/30/21 for PREA compliance verification.

Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.

Corrective Action Completion 10/4/21:

On 10/4/21, Agency provided auditor with a copy of the MOU between Solano County Sheriff's Office and SafeQuest Solano Inc. The term of the MOU is from July 1, 2021 until June 30, 2024. SafeQuest Solano, Inc. is a nonprofit organization dedicated to providing prevention education, community training, advocacy and intervention services to those affected b domestic violence, sex trafficking, and/or sexual assault (regardless of gender identity o sexual orientation). With an emphasis on client-centered and trauma-informed care SafeQuest Solano works with diverse partners to promote individual, family and community transformation. Inmates experiencing sexual abuse or harassment may report the behavior to any

correctional officer, deputy or civilian staff at their facility, or to a third party, such as a friend or family member, attorney or advocate, who may ake the report for them, or by calling the sexual assault hotline at SafeQuest Solano. Inmate can also call SafeQuest toll-free from any inmate phone.

The agency/facility has met the requirements of Standard provision(s) 115.51(b) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.51.

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.52 (a): Policy 14.005 mandates that "grievance procedures applicable to grievances relating to sexual assault abuse or harassment."</p> <p>Emergency Grievance for Sexual Assault (PREA):</p> <ol style="list-style-type: none"> 1. The following only applies to grievances relating to sexual assault abuse or harassment: <ol style="list-style-type: none"> a. When receiving an emergency grievance, the officer receiving the grievance shall take immediate action to ensure the inmate's safety, which may include temporarily isolating the inmate from others. b. If the grievance is against the officer who receives it, he/she shall notify his/her supervisor immediately. It shall be the responsibility of the supervisor to contact the Facility Commander to determine further immediate action. An investigation will begin immediately. c. There shall be no time limit imposed on when an inmate may submit a grievance regarding an allegation of any kind of sexual abuse. d. Inmates are not required to resolve these types of complaints informally. e. Inmates are not required to submit grievances to staff members who may be the subject of the complaint or be referred to them in any manner. f. Inmates filing grievances for sexual abuse of any kind may seek the assistance of any third party, including having the third party file the grievance on their behalf. However, the inmate must agree to have the request filed on their behalf and must personally pursue subsequent steps in the process. If the inmate refuses to have the grievance filed on his/her behalf, it shall be documented in a memorandum to the PREA Coordinator. g. After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the staff member shall immediately forward the grievance to the custody supervisor, who shall take immediate corrective action, provide an initial response within 48 hours, and issue a final agency decision within five (5) calendar days. h. As with Standard Grievances, all grievances pertaining to sexual assault or harassment shall be resolved as soon as reasonably possible within 90 days. i. Extensions to grievances pertaining to sexual assault /harassment may be granted for up to 70 days after the initial 90 days. k. Inmates who falsely file grievances or make false reports of sexual abuse of any kind shall be subject to disciplinary action. Evidence that the inmate acted in bad faith shall be fully documented in a disciplinary, incident or criminal report. l. Under no circumstances shall a grievance of this nature be resolved informally. 2. If the complaint is criminal in nature (sexual assault, an attempted assault or threats of sexual assault) and is recent: <ol style="list-style-type: none"> a. The officer receiving the grievance must take immediate action to secure the scene, protect the victim and existing evidence, and isolate the suspect. b. The supervisor and Facility Commander shall be notified and shall initiate the appropriate notifications to Solano Dispatch and the Investigations Bureau. c. The grievance shall be entered into JMS. The supervisor shall contact Solano Dispatch to request a detective from the Investigations Bureau respond and an official investigation begin immediately. 3. If the grievance is non-criminal and against another inmate, custody staff shall: <ol style="list-style-type: none"> a. Enter the grievance into Jail Management System (JMS)and immediately notify the supervisor to conduct a thorough investigation. This shall minimally include speaking with other inmates and the suspect. Upon completion of the investigation, if it is determined the inmate is at risk, the supervisor shall contact the Classification Unit for reclassification of the suspect. b. The grievance shall be entered into JMS and the PREA Coordinator notified. c. The PREA Coordinator and/or the PREA Compliance Manager shall be notified and provide an initial response within 72 hours, and shall issue a final decision within 7 days. d. A copy of the final decision shall be forwarded to the facility PREA Manager as soon as possible. 4. If the complaint is non-criminal in nature (sexual harassment), but against a staff member: <ol style="list-style-type: none"> a. The inmate is not required to submit the complaint to the staff member who is the subject of the complaint and the inmate shall not be referred to the staff member who is named in the grievance. b. The officer receiving these types of grievances shall: <ol style="list-style-type: none"> 1) Enter the grievance into JMS. 2) Immediately notify his/her supervisor, who shall immediately notify the Facility Commander to initiate the appropriate investigative action. 3). The Investigations Bureau will be contacted to initiate an investigation and follow-up by memorandum to the Facility Commander and Internal Affairs. 4). The involved staff member shall be reassigned to another housing unit until the conclusion of the investigation.

Relevant information is also outlined in the Inmate Handbook.

115.52 (b): Policy 14.005 mandates that "There shall be no time limit imposed on when an inmate may submit a grievance regarding an allegation of any kind of sexual abuse. Inmates are not required to resolve these types of complaints informally."

115.52 (c): Policy 14.005 mandates that "Inmates are not required to submit grievances to staff members who may be the subject of the complaint or be referred to them in any manner. A grievance alleging staff misconduct which threatens an inmate's immediate health and safety, and/or violates the law, general orders or procedures, shall be responded to immediately by the custody officer who receives the grievance. If the grievance is against the officer who receives it, he/she shall notify his/her supervisor immediately. It shall be the responsibility of the supervisor to contact the Facility Commander to determine further immediate action. An investigation will begins immediately. Inmates are not required to submit grievances to staff members who may be the subject of the complaint or be referred to them in any manner."

115.52 (d): Policy 14.005 mandates that "After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the staff member shall immediately forward the grievance to the custody supervisor, who shall take immediate corrective action, provide an initial response within 48 hours, and issue a final agency decision within five (5) calendar days. Agency alleged that In the past 12 months, one grievance was submitted and alleged sexual abuse. Auditor found that in the past 12 months, two grievances had been filed which alleged harassment. That grievance was resolved within 90 days after being filed. No grievance response extension has been issued during the past 12 months.

115.52 (e): Policy 14.005 mandates that "Third party reporters, such as a friend or family member, may report on behalf of the inmate. Information on reporting methods shall be distributed on the Solano County Sheriff's Office web site. complaints informally. Inmates filing grievances for sexual abuse of any kind may seek the assistance of any third party, including having the third party file the grievance on their behalf. However, the inmate must agree to have the request filed on their behalf and must personally pursue subsequent steps in the process. If the inmate refuses to have the grievance filed on his/her behalf, it shall be documented in a memorandum to the PREA Coordinator. Agency reports that there have been no grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance containing documentation of the inmate's decision to decline."

115.52 (f): Policy 14.005 Custody Procedure IV C Emergency Grievance for Sexual Assault (PREA) is the policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. This policy complies with PREA mandates. Agency reports that there have been no grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months.

115.52 (g): Policy 14.005 Inmate Grievance mandates that "Inmates who falsely file grievances or make false reports of sexual abuse of any kind shall be subject to disciplinary action. Evidence that the inmate acted in bad faith shall be fully documented in a disciplinary, incident or criminal report. Under no circumstances shall a grievance of this nature be resolved informally.

Agency reports that in the past 12 months, no inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.52.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.53 (a): PREA Policy 5.041, Investigation and Victim Support mandates that "A victim of sexual assault has the right to a victim advocate or victim support person for both the medical examination the investigatory process, unless the presence of the advocate or support person would be detrimental to the examination or interview, and the reason for exclusion can be properly articulated and documented."</p> <p>The Inmate Rule Book provides inmates with access to such services by giving inmates mailing addresses and toll-free hotline number for SafeQuest Solano, which provides victim advocacy, PREA Brochure at intake and PREA Posters throughout the facility which provides the same information as provided in the inmate Rule Book.</p> <p>The facility provides inmates with access to Consulates in San Francisco by giving inmates mailing addresses and telephone numbers to immigrant services agencies for persons detained solely for Civil Immigration purposes. The facility provides inmates with access to such services by enabling reasonable communication between inmates and these organizations in as confidential a manner as possible. Agency reports that no inmate has reported sexual abuse in the Claybank facility over the past 12 months.</p> <p>Interview with 16 Random Sample of Inmates indicates their understanding of available outside victim advocates for emotional support services related to sexual abuse. All inmates stated the services outside Agencies afforded to them is available through the inmate telephone hotline to SAFEQUEST. Hotline number is provided in the Zero-Tolerance Pamphlet, Posters throughout the Claybank facility and inmate Rule Book. During onsite audit, auditor attempted to contact SAFEQUEST via inmate phone to verify inmates have access to outside victim advocates for emotional support services related to sexual abuse by giving inmates toll-free hotline numbers where available. Auditor was not provided access to SafeQuest as the hotline number did not connect to the advocate center. During interviews with inmates and discussion with the PREA Compliance Manager, it seems SafeQuest changed their access phone number and did not inform the agency. On 9/13/21, Auditor conducted an onsite review to monitor the PREA hotline deficiency. Auditor conducted phone hotlines from randomly selected housing units. The calls connected to a call center who connected me to a SafeQuest advocate. The advocate informed the auditor that SafeQuest is a reporting agency for sexual abuse only in cases regarding elderly, vulnerable adults and Child Protective Services cases. If an inmate calls, and wishes to remain anonymous, their wishes are granted, the inmate is provided contact information to the different agencies and entities both outside of Solano County Jail and within, including who they can report to. SafeQuest will inform the Agency that a call was made to SafeQuest regarding sexual abuse or sexual harassment.</p> <p>115.53 (b): The End the Silence Brochure is provided to each inmate during Intake and Booking and informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. stating. "You also can make a report to SafeQuest Sexual Assault Hotline at (707) 422-7345 or #93 from an inmate phone. This resource is located outside the Solano County Jail, and you can remain anonymous upon request. These calls are free and are not recorded. Their mailing address is 1049 Union Ave, Fairfield, CA 94533."</p> <p>The Inmate Rule Book explains Confidentiality in the PREA section as "Information concerning the identity of the inmate victim reporting the sexual abuse and the facts of the report itself shall be limited to those who have a need to know in order to make decisions concerning the inmate victim's welfare and for law enforcement investigative purposes."</p> <p>Interview with 22 Random Sample of Inmates indicate all are aware of outside reporting Agency. All indicate call is toll-free, confidential and not monitored as indicated in the PREA poster in each housing unit. Agency reports no inmates in Claybank facility who reported sexual abuse in the Claybank facility.</p> <p>115.53 (c): MOU between Solano County Sheriff's Office and SafeQuest Solano was provided to auditor. Term of the MOU is 9/1/18 to 6/31/21. The MOU is expired and is no longer compliant with the PREA Standards.</p> <p>Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.53(c) and corrective action is required.</p> <p><u>Corrective Action Recommended:</u></p> <p>MOU between Solano County Sheriff's Office and SafeQuest Solano was provided to auditor. Term of the MOU is 9/1/18 to 6/31/21. The MOU is expired and is no longer compliant with the PREA Standards.</p> <ol style="list-style-type: none"> 1. Agency to provide auditor with copy of a valid MOU with SafeQuest Solano. 2. If there is no current agreement with SafeQuest Solano, Agency to provide alternative MOU with community service provider which provides inmates with emotional support services related to sexual abuse or provide verification of attempts to enter into MOUs or other agreements with community service providers that are able to provide such services and explain why these attempts have not been successful.

Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.

Corrective Action Completion 10/4/21:

On 10/4/21, Agency provided auditor with a copy of the MOU between Solano County Sheriff's Office and SafeQuest Solano Inc. The term of the MOU is from July 1, 2021 until June 30, 2024. SafeQuest Solano, Inc. is a nonprofit organization dedicated to providing prevention education, community training, advocacy and intervention services to those affected by domestic violence, sex trafficking, and/or sexual assault (regardless of gender identity or sexual orientation). With an emphasis on client-centered and trauma-informed care SafeQuest Solano works with diverse partners to promote individual, family and community transformation. Inmates experiencing sexual abuse or harassment may report the behavior to any correctional officer, deputy or civilian staff at their facility, or to a third party, such as a friend or family member, attorney or advocate, who may make the report for them, or by calling the sexual assault hotline at SafeQuest Solano. Inmate can also call SafeQuest toll-free from any inmate phone.

The agency/facility has met the requirements of Standard provision(s) 115.53(c) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.53

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.54 (a): The Inmate Rulebook mandates that "Reports can be made in writing or verbally, in the following ways. You can tell correctional staff, medical, mental health, chaplain, contractor, volunteer or any other person that you trust. You can contact SafeQuest Solano by direct dialing # 93 (free call) or (707-422-7345) on any inmate phone. You can tell your attorney or have someone from the outside, such as a friend or family member make the report for you. Personnel are instructed to keep the reported information confidential, and only discuss it with the appropriate officials on a need to know basis."</p> <p>PREA Policy 5/041 mandates that "Every employee shall immediately report information that indicates an inmate is being or has been sexually abused or sexually harassed, or that an incident of sexual misconduct has occurred, to the appropriate supervisor. Reporting of information shall be completed in a confidential manner.</p> <ol style="list-style-type: none"> 1. Reports may be initiated based on employee observations, by the alleged victim inmate, by third party inmates or by other third party persons, including anonymous reports. 2. Every employee shall accept reports made verbally or in writing. Verbal reports shall be promptly documented by the employee receiving the report. 3. Every employee is encouraged to follow the direct chain of command when reporting sexual abuse, sexual misconduct or sexual harassment, although minor deviations are acceptable when the employee is more comfortable reporting the allegation to another supervisor. 4. Reported allegations shall be treated with discretion. Employees shall not reveal any information related to a report to anyone other than those who need to know, as specified in this policy, for purposes of treatment, investigation and other security or administrative decisions. 5. Staff shall not discriminate in the response to a gay, bisexual, transgender or intersex inmate who reports that he/she has experienced sexual abuse, sexual misconduct or sexual harassment." <p>The agency or facility publicly distributes information on how to report inmate sexual abuse or sexual harassment on behalf of inmates via the website: www.solanocounty.com/depts/sheriff/default.asp</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.54.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 271 1485 533">115.61 (a): PREA Policy 5.041 mandates that "Every employee has a responsibility to protect the inmates in the custody of the Sheriff's Office. As such, detection of the signs of possible sexual abuse, sexual misconduct and sexual harassment is a necessary part of the care and custody process. B. Every employee shall immediately report information that indicates an inmate is being or has been sexually abused or sexually harassed, or that an incident of sexual misconduct has occurred, to the appropriate supervisor. Reporting of information shall be completed in a confidential manner. If an inmate reports having been sexually abused at a facility other than a Solano County Detention Facility, or by an employee of an agency other than the Solano County Sheriff's Office, the head of the facility (facility commander) that received the alleged abuse report shall notify the head of the facility or appropriate office where the alleged abuse occurred.</p> <ol data-bbox="242 539 1406 633" style="list-style-type: none"> 1. The facility head shall provide such notification as soon as possible, and not later than 72 hours after receiving the allegation. 2. The agency shall document the notification was completed. <p data-bbox="242 663 1481 857">Policy 13.016 Sexual Assaults in Custody mandates that "Staff who becomes aware of sexual abuse or harassment by another staff member shall immediately report the abuse or harassment. Furthermore, all staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who report such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Failure to do so is akin to committing the act and subjects the staff member with knowledge of the act to discipline. Staff may report these acts in the following ways:</p> <ol data-bbox="242 864 738 958" style="list-style-type: none"> 1. Verbally to a supervisor or facility commander. 2. In writing via memorandum to Internal Affairs. 3. Verbally via telephone, to Internal Affairs." <p data-bbox="242 987 1433 1115">Interview of random sample of 16 custody staff in case of the agency requires all staff recording all the suspicion reformation regarding the incidence of sexual abuse or sexual race with that occurred in the facility to include retaliation against the inmates or staff report of such incident in any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation.</p> <p data-bbox="242 1144 1458 1238">115.61 (b): PREA Policy 5.041 mandates that "Reported allegations shall be treated with discretion. Employees shall not reveal any information related to a report to anyone other than those who need to know, as specified in this policy, for purposes of treatment, investigation and other security or administrative decisions."</p> <p data-bbox="242 1245 1453 1373">Interview with the rim sample of 12 staff states that the agency requires all staff to report any knowledge suspicion or information regarding an incident of sexual abuse or sexual acts with occurred in facility retaliation guess inmates or staff reported such an incident in any staff neglect or violation of responsibility that may have contributed to an incident or retaliation.</p> <p data-bbox="242 1402 1465 1565">115.61(c): Policy 13.016 Sexual Assaults in Custody mandates that "Medical and mental health staff members are considered mandatory reporters. Subsequently, they shall, as required by law, report all disclosures made by inmates related the threats to kill or injure themselves or others, and any threat of sexual violence toward another. Jail medical and mental health professionals are required to inform inmates of their duty to report, and the limitations of confidentiality at the initiation of any services provided."</p> <p data-bbox="242 1572 1493 1700">Interview with a random sample of medical mental health staff in case that administration services to an inmate they required to disclose limitations confidentiality and their duty to report. They accomplish this through sign consent forms. They are also required to report any knowledge suspicion or information regarding an incident of sexual abuse or sexual harassment to designated supervisor or official immediately upon learning of it.</p> <p data-bbox="242 1729 1485 1892">115.61 (d): Agency indicates if alleged victim is under 18 or considered a vulnerable adult, Agency shall report the allegation to the designated or local services agency under the applicable mandatory reporting laws (CPS, Elder Abuse, etc). Interview with Facility Commander (Sheriff Designee) and PREA Coordinator indicates the investigation is initiated immediately. In the case of victim under the age of 18, California Protection Services is notified. In the case of a vulnerable adult, local Elder abuse or ADA Agencies are notified.</p> <p data-bbox="242 1899 1481 2058">Interview with the Facility Commander and PREA Coordinator indicates that no 18 year olds or vulnerable adults are housed in the Claybank Facility. Should detainees 18 years or under report sexual abuse or sexual harassment, a report to Child Protective Services and an investigation would be conducted immediately. In the event the victim was a vulnerable adult, a notification to Social Services, Elder Abuse or any other local or State services as mandated by law would be initiated and an investigation would be conducted immediately.</p> <p data-bbox="242 2087 1445 2148">115.61 (e): "Policy 13.016 mandates Staff who becomes aware of sexual abuse or harassment by another staff member shall immediately report the abuse or harassment. Custody Staff will work in support of Sheriff's Office Investigations</p>

personnel to protect the victim and to preserve the scene and potential evidence associated with all PREA incidents. Sheriff's Office Investigations personnel are responsible for conducting all PREA investigations and subsequent follow-up with victim. Policy 5.014 mandates reports may be made in numerous ways, to include one way for inmates to report abuse or harassment to a public or private entity or office not part of this agency:

1. In person to any staff member, including medical and/or mental health professionals;
2. Third party reporters, such as a friend or family member, may report on behalf of the inmate. Information on reporting methods shall be distributed on the Solano County Sheriff's Office web site.

Interview with Facility Commander (Sheriff designee) indicates facility staff is trained and mandated to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to their immediate supervisors and the facility's designated investigators."

Interview with the Facility Commander indicates that all allegations of sexual abuse and sexual harassment including those from third-party and non-sources are reporting directly to the designated facility investigators.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.61.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 210 451 235">Auditor Discussion</p> <p data-bbox="242 271 1493 398">115.62 (a): Policy 13.016 Custody Division Procedure mandates that "When the agency learns that an inmate is in substantial risk of imminent sexual abuse, the agency shall take immediate action to protect the inmate." Agency reports that in the past 12 months, there were no instances where the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse.</p> <p data-bbox="242 405 1465 499">Interview with Agency Head designee indicates that when the Agency learns that an inmate may be subject to substantial risk of sexual abuse, protective measures or action is taken such as moving staff if they are in fault pending investigation. Agency can also move inmate victim or perpetrator to another facility or housing unit.</p> <p data-bbox="242 506 1442 566">Interview with Facility Commander indicates that in a case that when facility learns that an inmate is at substantial risk of sexual abuse, the victim or perpetrator can be moved to another housing unit or facility pending investigation.</p> <p data-bbox="242 573 1485 667">Interview with random sample of 12 staff indicates that once they learn an inmate is at risk of imminent sexual abuse, inmate is moved from the area to make them safe, separate the victim from the perpetrator, placed in a single cell, contact classifications to re-house the victim, contact the supervisor and take immediate action to protect that inmate.</p> <p data-bbox="242 696 1334 721">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.62.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1485 398">115.63 (a): PREA Policy 5.041 mandates that "If an inmate reports having been sexually abused at a facility other than a Solano County Detention Facility, or by an employee of an agency other than the Solano County Sheriff's Office, the head of the facility (facility commander) that received the alleged abuse report shall notify the head of the facility or appropriate office where the alleged abuse occurred.</p> <ol data-bbox="240 405 1453 499" style="list-style-type: none"> <li data-bbox="240 405 1453 465">1. The facility head shall provide such notification as soon as possible, and not later than 72 hours after receiving the allegation. <li data-bbox="240 472 911 499">2. The agency shall document the notification was completed." <p data-bbox="240 528 1469 589">Agency reports that in the past 12 months, 1 allegation was received by the Claybank facility to indicate that an inmate was abused while confined at another facility.</p> <ol data-bbox="240 618 1453 678" style="list-style-type: none"> <li data-bbox="240 618 1453 678">1. Agency to provide auditor with copy of the allegation to include the response to other agency and outline of the actions taken to include date allegation was received and date the information was sent to the relevant agency. <p data-bbox="240 707 1485 1205">RESPONSE: In the past 12 months, 1 allegation was recieved by the facility to indicate that an inmate was abused while confined at another facility. Agency indicates that information was sent to the relevant agency. Agency provided auditor with copy of e-mail between Claybank Facility Commander and head of the Folsom State Prison Investigative Services Lt. on 4/8/21 informing the Agency that on 4/8/21, Solano County Claybank Facility was informed by a former inmate of theirs who reported being a victim of an unreported sexual assault while in Folsom Prison, which allegedly occurred in 2011. The victim did not remember the exact date of the incident nor the name of the inmate who attacked him. Further details and documentation were requested and provided to Folsom for them to conduct a PREA investigation into the matter. Agency provided auditor with Documented Notification e-mail between Solano CJ Facility Commander and Folsom Prison contact. In the past 12 months, 1 allegation was recieved by the facility to indicate that an inmate was abused while confined at another facility. Agency indicates that information was sent to the relevant agency. Agency provided auditor with copy of e-mail between Claybank Facility Commander and head of the Folsom State Prison Investigative Services Lt. on 4/8/21 informing the Agency that on 4/8/21, Solano County Claybank Facility was informed by a former inmate of theirs who reported being a victim of an unreported sexual assault while in Folsom Prison, which allegedly occurred in 2011. The victim did not remember the exact date of the incident nor the name of the inmate who attacked him. Further details and documentation were requested and provided to Folsom for them to conduct a PREA investigation into the matter.</p> <p data-bbox="240 1234 1453 1361">115.63 (b): PREA Policy 5.041 mandates that "If an inmate reports having been sexually abused at a facility other than a Solano County Detention Facility, or by an employee of an agency other than the Solano County Sheriff's Office, the head of the facility (facility commander) that received the alleged abuse report shall notify the head of the facility or appropriate office where the alleged abuse occurred.</p> <ol data-bbox="240 1368 1453 1462" style="list-style-type: none"> <li data-bbox="240 1368 1453 1429">1. The facility head shall provide such notification as soon as possible, and not later than 72 hours after receiving the allegation. <li data-bbox="240 1435 911 1462">2. The agency shall document the notification was completed." <p data-bbox="240 1491 1485 1619">115.63 (c): PREA Policy 5.041 mandates that "If an inmate reports having been sexually abused at a facility other than a Solano County Detention Facility, or by an employee of an agency other than the Solano County Sheriff's Office, the head of the facility (facility commander) that received the alleged abuse report shall notify the head of the facility or appropriate office where the alleged abuse occurred.</p> <ol data-bbox="240 1626 1453 1720" style="list-style-type: none"> <li data-bbox="240 1626 1453 1686">1. The facility head shall provide such notification as soon as possible, and not later than 72 hours after receiving the allegation. <li data-bbox="240 1693 911 1720">2. The agency shall document the notification was completed." <p data-bbox="240 1749 1485 2045">In the past 12 months, 1 allegation was recieved by the facility to indicate that an inmate was abused while confined at another facility. Agency indicates that information was sent to the relevant agency within 24 hours of notification. Agency provided auditor with copy of e-mail notification between Claybank Facility Commander and head of the Folsom State Prison Investigative Services Lt. on 4/8/21, informing the Agency that on 4/8/21, Solano County Claybank Facility was informed by a former inmate of theirs who reported being a victim of an unreported sexual assault while in Folsom Prison, which allegedly occurred in 2011. The victim did not remember the exact date of the incident nor the name of the inmate who attacked him. Further details and documentation were requested and documentation was provided to Folsom for them to conduct a PREA investigation into the matter. Agency provided auditor with Documented Notification e-mail between Solano CJ Facility Commander and Folsom Prison contact.</p> <p data-bbox="240 2074 1453 2134">115.63 (d): PREA Policy 5.041 mandates that "Allegations received of incidents that allegedly occurred in a confinement facility under the jurisdiction of Solano County Sheriff's Office from other facilities or agencies are to be investigated in</p>

accordance with PREA standards." Agency reports that in the past 12 months, there has been no allegations of sexual abuse the facility received from other facilities.

Interview with Agency Head designee and Facility Commander indicates that if another agency refers allegations of sexual abuse or sexual harassment allegations that occurred in one of Solano CJ facilities, the PREA Coordinator is looped in, case is investigated. There have been no examples of such allegations being reported from another facility or agency. Interview with Facility Commander indicates that the case would be immediately investigated after obtaining any relevant information the Agency has to pass on to aid in the investigation.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.63.

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 863 297">115.64 (a): Policy 13.016 Custody Procedure mandates that:</p> <ol data-bbox="240 331 1481 1361" style="list-style-type: none"> 1. When the agency learns that an inmate is in substantial risk of imminent sexual abuse, the agency shall take immediate action to protect the inmate. 2. 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. No agency shall require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation. 3. Identify and separate the suspect and victims. Notify your immediate supervisor. Secure the crime scene and ask for assistance. 4. The sergeant will assign custody staff to protect the crime scene, gather witnesses and keep them separate until they can be interviewed by the Sheriff's Office Investigations personnel. 5. Identify and isolate the assailant(s) and any other duties related to the crime. 6. Identify and place the inmate/victim in a secure protective area with no access to running water, until he/she can be seen by medical staff and/or transport to the hospital. Request Medical staff to respond immediately. 7. If the assault occurred within a time period that still allows for the collection of physical evidence, explain to the inmate he/she is not to shower, wash, drink, eat, or defecate until he/she has been examined by Medical staff and/or transported to the hospital. The inmate should be asked if he/she has partaken in any of these activities prior to reporting. This information shall be communicated to responding investigative personnel and medical staff. 8. After a preliminary investigation has been conducted and documented, regardless if the inmate has made a decision to press charges or requests anonymity, the on-duty sergeant will notify Solano Dispatch to request a detective. 9. Request in-house medical staff to respond and/or escort the inmate to a medical examination room, as directed, for a medical evaluation. Medical staff may require the inmate be transported to the hospital for a forensic sexual assault examination, if appropriate. The inmate shall be advised that there is no cost to them for any medical treatment pertaining to the assault, including the forensic medical exam. <ol data-bbox="261 1066 1481 1361" style="list-style-type: none"> a. The inmate may not want to report the name of the assailant(s) or cooperate with the investigation, but he/she is, nevertheless, entitled to protection, as well as medical and mental health treatment and support services, at no cost to him/her. b. The inmate shall be offered the services of a victim advocate and if the inmate does request a victim's advocate, the advocate is to be permitted to be with the inmate throughout the investigatory process. Access to the inmate shall be made available upon return to the facility as well. The advocate's role during this process is to provide emotional support, crisis intervention, information, and referrals. c. As with any other criminal investigation, information related to cases of sexual assault or harassment is confidential and shall only be discussed with those involved in the case. <p data-bbox="240 1395 1490 1753">Agency reports that over the past 12 months, 1 inmate made an allegation that he was sexually abused. At no time during the past 12 months did security staff respond to separate the alleged victim and abuser, arrive within a period of time that allowed for collection of evidence, notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence, notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested 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, notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p data-bbox="240 1765 1490 1955">The inmate who made the report of sexual abuse allegation is no longer housed at the Solano CJ. Interview with Security Staff and Non-Security Staff First Responders indicate that they have been trained on response to sexual abuse response protocol. Both security and non-security staff are trained in the response protocol and recited that actions they need to take as a 1st Responder. Auditor interviewed a random sample of 12 staff. At the end of the interviews, auditor requested to view their 1st Responder response cards. 11 of the 12 staff possessed their 1st Responder cards and indicated they were instructed to maintain the cards while on duty in the event they need reference during a 1st Responder situation.</p> <p data-bbox="240 1989 1490 2045">115.64 (b): Policy 13.016 Custody Procedure mandates that An inmate may notify a civilian staff member if a sexual assault or harassment has occurred. If this occurs, the following guidelines are to be followed:</p> <ol data-bbox="240 2056 1406 2145" style="list-style-type: none"> 1. If an inmate claims to have been sexually abused or harassed, contact custody staff or sergeant immediately. It is important that all contacts with the inmate be professional and nonjudgmental. 2. Ascertain the inmate's immediate physical well-being and contact medical staff as needed. Keep the inmate under

observation until custody staff arrives. While maintaining observation of the inmate, communicate to the inmate the necessity to avoid the following activities until the deputy arrives (this is vital in the event physical evidence is still present):

- a. Changing clothes
- b. Using the toilet
- c. Washing/Showering
- d. Eating/Drinking

3. Ensure the inmate's safety and notify the nearest custody staff member.

Agency reports there were no allegations of inmate sexual abuse made in the past 12 months where a non-security staff member was the first responder.

Interview with Security Staff and Non-Security Staff First Responders and Random Sample of 12 selected custody staff indicate their knowledge and responsibilities as 1st responders to preserve usable physical evidence.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.64.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1485 432">115.65 (a): Agency provided auditor with a copy of the Coordinated Response Protocol dated July 2018. "The purpose of this protocol is to provide guidance for all employees, contractors, and volunteers, of the steps required when responding to any inmate sexual abuse call within our correctional facilities. This protocol has been developed using the Solano County Sheriff's Office policies and procedures as well as the National Protocol for Sexual Assault Medical Forensic Examinations from the U.S. Dept. of Justice, April 2013."</p> <p data-bbox="244 439 703 465">The protocol includes responses/actions from:</p> <ul data-bbox="244 472 756 869" style="list-style-type: none"> Custody Staff First Responders Medical/Mental Health Facility PREA Manager Supervisors Criminal Investigations SafeQuest for Victim Advocacy and inmate support Northbay Medical Center for forensic examinations Shift Sergeant PREA Coordinator Facility Commander Internal Affairs unit when appropriate <p data-bbox="244 898 1485 992">Interview with Facility Commander indicates that Claybank Correctional Facility possesses a Coordinated Response Protocol in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership as verified through auditor's review of the Coordinated Response Protocol.</p> <p data-bbox="244 1021 1334 1048">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.65.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1422 398">115.66 (a): The agency, provided the auditor with copies of new or renewed collective bargaining agreement or other agreement since the last PREA audit which occurred in 2020. 2019-2022 MOU Unit 13 - Correctional Officers - 12/3/19 - 10/21/22 2020-2022 MOU Unit 14 - Correctional Supervisors - 1/7/20 - 10/21/22</p> <p data-bbox="244 432 1473 622">Neither of the collective bargaining agreements prohibits agency 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 Interview with Agency Head designee indicates Correctional Officer MOU which includes Sgt & Lt MOU does not restrict Agency from removing alleged staff sexual abusers from contact with any inmates pending an investigation or a determination of whether and what extent discipline is warranted.</p> <p data-bbox="244 656 810 683">115.66 (b): Auditor is not required to audit this provision.</p> <p data-bbox="244 712 1334 739">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.66.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.67 (a): PREA Policy 5.041 mandates that "An inmate may report sexual abuse, sexual misconduct, 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 an incident of sexual abuse by any employee, volunteer or contractor. Reports may be made in numerous ways, to include numerous ways for inmates to report abuse or harassment to a public or private entity or office not part of this agency."</p> <p>Policy 18.001 Custody Policy & Procedure mandates that "Inmates who report or cooperate with investigations pertaining to sexual abuse or harassment shall have their conduct and treatment monitored for at least 90 days, unless the report is determined to be unfounded. The office will take appropriate actions to protect anyone who cooperates with a PREA related investigation and expresses fear of retaliation. This will include periodic face-to-face discussions with the inmate. Any indications of retaliation shall be acted upon immediately, with the inmate's safety as a priority."</p> <p>Agency has designated a Custody Lieutenant to monitor possible retaliation.</p> <p>115.67 (b): Policy 18.001 Custody Policy & Procedure mandates that "Protective measures shall include, but are not limited to:</p> <ol style="list-style-type: none"> a. Housing unit change for victim or suspect b. Assignment to Administrative Separation c. Emotional support services provided to the victim <p>2. Indicators of possible problems include:</p> <ol style="list-style-type: none"> a. Disciplinary reports b. Housing or cell changes c. Program changes <p>During the onsite audit, there were no inmates housed in the Claybank facility who were housed in Segregated Housing for risk of sexual victimization/who allege to have suffered sexual abuse, and no inmates who reported sexual abuse. Interview with Agency Head Designee indicates that inmates and staff are protected from retaliation fo sexual abuse or sexual harassment allegations by rehousing victim or perpetrator and reclassifies them with a no-contact clause in their classification file. victim is placed on retaliation monitoring for at least a 90 day period. If staff was the perpetrator of retaliation he or she is placed on administrative leave pending investigation.</p> <p>Interview with Facility Commander indicates that measures taken to protect inmates and staff from retaliation include monitoring and interviewing, move them to a different location or facility depending on situation. Each case is taken into consideration when making inmate or staff moves.</p> <p>Interview with PREA Compliance Manager who monitors retaliation indicates that they monitor retaliation to ensure the victims are not being retaliated against conduct face-to-face interviews to monitor retaliation. Different measures are taken to protect the inmates and staff retaliation such as housing through classification change, monitoring reports and monitoring grievances.</p> <p>115.67 (c): Policy 18.001 Custody & Procedure mandates that Inmates who report or cooperate with investigations pertaining to sexual abuse or harassment shall have their conduct and treatment monitored for at least 90 days, unless the report is determined to be unfounded. The office will take appropriate actions to protect anyone who cooperates with a PREA related investigation and expresses fear of retaliation. This will include periodic face-to-face discussions with the inmate. Any indications of retaliation shall be acted upon immediately, with the inmate's safety as a priority."</p> <p>PREA Policy 5.041 mandates that "The facility commander shall ensure that the conduct and treatment of inmates or staff who report sexual abuse or cooperate with an investigation is monitored for signs of retaliation for at least ninety (90) days following the report or cooperation.</p> <ol style="list-style-type: none"> 1. If necessary, the facility commander shall investigate and act promptly to remedy any such retaliation. 2. Monitoring shall include review of inmate disciplinary reports, housing, or program changes, or negative staff performance reviews, or reassignment of staff. Monitoring shall continue if initial monitoring indicates a continued need. 3. The facility commander shall forward copies of all reports of retaliation to the PREA Coordinator who shall also maintain records of the event." <p>Agency reports the have been no occurrences of retaliation in the past 12 months.</p> <p>Interview with Facility Commander indicates the mission he takes when suspects retaliation to interview to obtain the facts, monitor the situation, re-house if needed, and include PREA Coordinator in any decisions that are made.</p> <p>Interview with staff monitors retaliation indicates he looks for possible retaliation in disciplinary reports, housing changes, program changes, negative performance reviews for staff or reassignments of staff through periodic checks. He also monitors any grievances or reclassification records with regards to inmates. Retaliation monitor also maintains monitoring for</p>

at least 90 days. If there's a concern that potential retaliation may occur there is no maximum amount of time that he would monitor.

115.67 (d): Policy 18.001 Custody & Procedure mandates that Inmates who report or cooperate with investigations pertaining to sexual abuse or harassment shall have their conduct and treatment monitored for at least 90 days, unless the report is determined to be unfounded. The office will take appropriate actions to protect anyone who cooperates with a PREA related investigation and expresses fear of retaliation. This will include periodic face-to-face discussions with the inmate. Any indications of retaliation shall be acted upon immediately, with the inmate's safety as a priority."

Interview with staff monitors retaliation indicates he looks for possible retaliation in disciplinary reports, housing changes, program changes, negative performance reviews for staff or reassignments of staff through periodic checks. He also monitors any grievances or reclassification records with regards to inmates. Retaliation monitor also maintains monitoring for at least 90 days. If there's a concern that potential retaliation may occur there is no maximum amount of time that he would monitor.

115.67 (e): PREA Policy 5.041 mandates that "Retaliation against any employee or inmate for reporting or cooperating with a sexual abuse investigation is a form of employee misconduct and is strictly prohibited. Such actions are a separate violation of this policy."

Policy 18.001 Custody & Procedure mandates that Inmates who report or cooperate with investigations pertaining to sexual abuse or harassment shall have their conduct and treatment monitored for at least 90 days, unless the report is determined to be unfounded. The office will take appropriate actions to protect anyone who cooperates with a PREA related investigation and expresses fear of retaliation. This will include periodic face-to-face discussions with the inmate. Any indications of retaliation shall be acted upon immediately, with the inmate's safety as a priority."

Interview with Agency Head designee indicates that

Interview with Facility Commander indicates for allegations of sexual abuse or sexual-harassment different measures are taken to protect inmates and staff from retaliation such as monitoring, interviewing, periodic contact and move to different housing units or facilities. Depending on situation take each case under consideration when making inmates or staff moves. Conduct interviews to obtain facts, monitor situation to make moves and include the PREA Coordinator in any decision.

115.67(f): N/A - Auditor not required to audit this Standard provision.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.67.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 271 1484 432">115.68 (a): Policy 18.001 Custody Policy & Procedure mandates that "Inmates at high risk for sexual victimization shall not be placed in involuntary separated 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. Inmates may be held in involuntary protective custody for less than 24 hours while an assessment is completed."</p> <p data-bbox="240 439 1481 499">4. Every 30 days, a review to determine a continuing need for separation from general population will be conducted and documented in JMS.</p> <p data-bbox="240 506 1390 566">5. For inmates who are housed over 30 days on an involuntary basis, the following shall be documented in Jail Management System (JMS):</p> <ul style="list-style-type: none"> <li data-bbox="268 573 691 600">a. The concern for the inmate's safety <li data-bbox="268 607 836 633">b. The reason for no alternative means of separation <p data-bbox="240 640 1362 701">6. Every 30 days, a review for the continuing need for separation shall be performed and documented in Jail Management System (JMS)."</p> <p data-bbox="240 730 1469 857">Agency reports there are no inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment. Agency reports there have been no inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for longer than 30 days awaiting completion of assessment.</p> <p data-bbox="240 864 1490 992">Interview of Facility Commander and staff who supervise inmates in segregated housing indicate that Interview with Facility Commander and Staff who Supervise Inmates in Segregated Housing indicates inmates placed in segregated housing to protect an inmate who is alleged to have suffered sexual abuse are moved within 24 hours. During onsite audit there were no inmates housed in Segregated Housing (for risk of sexual victimization/who allege to have suffered sexual abuse).</p> <p data-bbox="240 1055 1334 1081">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.68.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>115.71 (a): Policy 6.011 Jail Incidents mandates that "The purpose of this order is to provide a guide for procedure in reporting any jail incident which may occur in the Solano County jail system. The incident may be either criminal or non-criminal in nature."</p> <p>Policy 13.016 Custody Division Procedure mandates that "Sheriff's Office Investigations personnel are responsible for conducting all PREA investigations and subsequent follow-up with victim. It is important that all contact with sexual assault inmates be professional and nonjudgmental. Staff who becomes aware of sexual abuse or harassment by another staff member shall immediately report the abuse or harassment. Furthermore, all staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who report such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Failure to do so is akin to committing the act and subjects the staff member with knowledge of the act to discipline."</p> <p>Interview with Investigative Staff indicates that sexual abuse investigations begin as soon as possible. Investigators work 5 AM to 7 PM in the event an allegation of sexual abuse arises outside of that time a Sheriff's Deputy initiates the investigation and refers to the investigative staff. A patrol deputy sheriff shall be dispatched as soon as possible to the scene to investigate the matter. All cases shall be subject to a comprehensive investigation. All cases deemed criminal will be subject to the District Attorney's Office through normal processing procedure. Investigative Staff indicates patrol investigators are called and immediately begin the investigative process. Investigations are conducted in accordance with 1040 & 1042 of the Penal Code and as mandated by National Institute of Corrections (NIC) Training for Sexual Abuse Investigations in a Confinement Setting. A deputy sheriff shall be dispatched as soon as possible to the scene to investigate the matter. All cases shall be subject to a comprehensive investigation. All cases deemed criminal will be subject to the District Attorney's Office through normal processing procedure. Investigative Staff indicates patrol investigators are called and immediately begin the investigative process.</p> <p>115.71 (b): PREA Policy 5.041 mandates that "In addition to general training provided to all employees, the Sheriff's Office shall ensure that investigators receive documented training in sexual abuse investigations in confinement settings." Verification documentation is found in provision 115.34(c).</p> <p>Interview with investigative staff indicates that all special investigators receive online training through national Institute of corrections. The course includes conducting an Investigation in confinement setting, steps and procedures taken to conduct the investigation. Training topics include techniques for interviewing sexual abuse victims, proper use of Miranda and Gary warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative or prosecution referral.</p> <p>Agency reports that all custody staff is mandated to complete the NIC training for Sexual Abuse Investigations in a Confinement Setting.</p> <p>115.71 (c): Policy 13.016 Sexual Assaults in Custody mandates Sheriff's Office Investigations personnel are responsible for conducting all PREA investigations and subsequent follow-up with victim. Interview with Investigative Staff indicates Investigations are conducted in accordance with 1040 & 1042 of the California State Penal Code and as mandated by NIC Training for Sexual Abuse Investigations in a Confinement Setting.</p> <p>Policy 5.041 PREA mandates that the criminal investigation, and all necessary processes required to collect evidence, will be under the direction of the assigned criminal investigator.</p> <p>Policy 6.011 Jail Incidents mandates that the investigating deputy sheriff duty and responsibility to:</p> <ul style="list-style-type: none"> A. Conduct a preliminary investigation to determine if a crime has been committed. B. If a crime has been committed, obtain a case number. C. Collect all evidence. D. Interview employees and inmates who have witnessed the incident as soon as possible. <p>Interview of Investigative Staff indicates that first steps in initiating an investigation is for investigators to arrive on scene as soon as possible. Investigators determine if a crime has occurred or it is an administrative investigation is needed. A description of the investigative process includes the initial allegation, first responder actions. The investigative process includes a review to see if medical assistance was needed, physical and forensic evidence is collected, interview witnesses, review camera footage and phone records, review the crime scene and document in a written report.</p> <p>115.71 (d): PREA Policy 5.041 mandates that when evidence appears to support criminal prosecution of staff, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.</p> <p>Interview with investigative staff indicates that investigators will not conduct compelled interviews without consulting</p>

prosecutors so as not to taint the criminal case. Agency provided auditor with 2 sexual harassment cases as these are the only two investigations conducted over the past 12 months. No criminal cases have been investigated over the past 12 months.

115.71 (e): Policy 13.016 Sexual Assaults in Custody mandates 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. No agency shall require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation.

Interview with Investigative Staff indicates the credibility of an alleged victim is determined through the investigative process. No polygraph or truth-telling device is used as a condition for proceeding with the investigation of a sexual abuse allegation.

115.71 (f): Agency investigative procedures includes investigative staff to determine whether staff actions or failures to act contributed to the abuse. Administrative and criminal investigations shall be documented in written reports that include witness accounts, inmate statements, physical evidence and informational reports to be included in the crime report. Interview with Internal Affairs Investigative Staff indicates the effort to determine whether staff actions or failures to act contributed to the abuse focuses on inaction or conduct of the staff member involved. Investigators look for negligence on staff's part or liability on part of the Agency. Both Administrative and Criminal Investigations are documented.

115.71 (g): Policy 6.011 Jail Incidents mandates the investigating deputy sheriff duty and responsibility to:

- A. Conduct a preliminary investigation to determine if a crime has been committed.
- B. If a crime has been committed, obtain a case number.
- C. Collect all evidence.
- D. Interview employees and inmates who have witnessed the incident as soon as possible.
- E. Obtain and attach copy of correctional Officer's reports to the crime report

Interview with Investigative Staff indicates both Administrative and Criminal Investigations are documented with testimonial, description of physical evidence attached.

115.71 (h): PREA Policy 5.041 mandates that "all allegations of conduct of the suspected perpetrator that appear to be criminal shall be referred to the District Attorney's Office for consideration of criminal complaint. At the conclusion of the criminal investigation, the inmate alleging abuse shall be informed in writing of the investigative outcome related to the alleged sexual abuse in a Sheriff's Office facility. The inmate shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded."

Agency provided auditor with copies of 2 investigations, 1 sexual harassment allegation and 1 sexual abuse allegation. Both cases were determined to be unfounded sexual harassment cases. Interview with Investigative Staff indicates substantiated and unsubstantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

115.71(i): PREA Policy 5.041 mandates that "Copies of the reports of the completed investigation shall be forwarded to the PREA Coordinator, who must document the incident to the US Department of Justice using form SSV-1A. A copy of this form shall be maintained by the agency for no less than ten years. Copies of all administrative and criminal investigation reports shall be retained for as long as the alleged abuser is incarcerated or employed, plus 5 years."

Agency provided auditor with copies of the 2 administrative allegations of sexual harassment. No sexual abuse investigations have been conducted over the past 12 months. Agency maintains sexual abuse and and sexual harassment for at least

115.71(j): PREA Policy 5.041 mandates that "In the event that the suspected abuser leaves the employment of the agency, or the inmate has been released, the investigation shall continue."

Interview with Investigative Staff indicates the departure of the alleged abuser, staff or inmate, from the employment or control of the facility or agency shall not provide a basis for terminated an investigation.

115.71 (k): N/A - Auditor is not required to audit this provision.

115.71 (l): N/A - Standard provision 115.71(l) does not apply as Agency conducts both administrative and criminal investigations.

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115..71

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1485 398">115.72 (a): Agency indicates they impose a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated. Review of the two investigative reports of sexual abuse and sexual harassment conducted over the past 12 months verify compliance with Standard provision 115.72(a).</p> <p data-bbox="244 405 1477 667">Policy GO #5.041 PREA mandates that all allegations of conduct of the suspected perpetrator that appear to be criminal shall be referred to the District Attorney's Office for consideration of criminal complaint. At the conclusion of the criminal investigation and/or administrative investigation, the inmate alleging abuse shall be informed in writing of the investigative outcome related to the alleged sexual abuse in a Sheriff's Office facility. The inmate shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. All substantiated allegations of conduct of the suspected perpetrator that appear to be criminal shall be referred to the District Attorney's Office for consideration of criminal complaint. Interview with Investigative Staff indicates preponderance of the evidence is the standard imposed in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p data-bbox="244 696 1337 723">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.72.</p>

115.73	Reporting to inmates
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 1485 499">115.73 (a): PREA Policy 5.041 mandates that "at the conclusion of the criminal investigation and/or administrative investigation, the inmate alleging abuse shall be informed in writing of the investigative outcome related to the alleged sexual abuse in a Sheriff's Office facility. All such notifications shall be documented. Agency reports that over the past 12 months 1 criminal allegation of sexual abuse and 1 administrative investigation of alleged sexual harassment were completed by the agency/facility. Both investigations were determined to be administrative investigations and unfounded. Documented notification provided to auditor verified that both inmates were notified in writing as to the the results of the investigative findings.</p> <p data-bbox="242 528 1469 589">115.73 (b): N/A- Standard provision 115.73(b) is not applicable to Agency as they conduct both administrative and criminal investigations.</p> <p data-bbox="242 676 1334 705">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.73.</p> <p data-bbox="242 734 1477 795">115.73(c): Policy 5.041 PREA mandates where the inmate alleges that a staff member committed sexual abuse, unless the allegation is determined to be unfounded, the inmate shall be informed in writing whenever any of the following occur:</p> <ol data-bbox="242 801 1385 929" style="list-style-type: none"> 1. The staff member is no longer posted within the inmate's housing unit. 2. The staff member is no longer employed or assigned at the facility. 3. The staff member has been indicted or criminally charged with a crime related to sexual abuse within the facility. 4. The staff member has been convicted on a charge related to sexual abuse within the facility. <p data-bbox="242 958 1489 1055">Agency reports there has not been any substantiated or unsubstantiated complaint of sexual abuse committed by a staff member against an inmate in an agency facility over the past 12 months. The only inmate who reported an unfounded sexual abuse was no longer housed at the Solano County Jail.</p> <p data-bbox="242 1084 1485 1144">115.73(d): Policy 5.041 PREA mandates Where the inmate alleges that another inmate committed sexual abuse, unless the allegation is determined to be unfounded, the inmate shall be informed in writing whenever any of the following occur:</p> <ol data-bbox="242 1151 1361 1211" style="list-style-type: none"> 1. The alleged abuser has been indicted or criminally charges with a crime related to sexual abuse in the facility. 2. The alleged abuser has been convicted on a charge related to sexual abuse within the facility. <p data-bbox="242 1240 1469 1270">There is no documentation or investigation where an inmate was sexually abused by another inmate in the past 12 months.</p> <p data-bbox="242 1299 1485 1458">115.73(e): Policy 5.041 PREA mandates that At the conclusion of the criminal investigation and/or administrative investigation, the inmate alleging abuse shall be informed in writing of the investigative outcome related to the alleged sexual abuse in a Sheriff's Office facility. All such notifications shall be documented. Review of the 1 sexual abuse investigation and 1 sexual harassment investigation provided by Agency indicate both inmates were provided written notification as to the outcome of the investigation.</p> <p data-bbox="242 1487 855 1516">115.73(f): N/A - Auditor is not required to audit this provision.</p>

115.76	Disciplinary sanctions for staff
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1489 432">115.76(a): Policy 3.003 Misconduct mandates misconduct violation of any law, Sheriff's Office General Order, County policy, Civil Service rule, Departmental procedures or orders by memorandum; neglect of duty; or any conduct or action which is detrimental to the good order and discipline of the Sheriff's Office and/or which tends to give the community or components of the criminal justice system a negative and/or unfavorable inmate of the Sheriff's Office or County of Solano may result in discipline, up to and including termination.</p> <p data-bbox="240 439 1485 566">PREA Policy 5.041 mandates that "All sexual abuse allegations shall be thoroughly investigated, and where appropriate, criminal prosecution and/or disciplinary action shall result. 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."</p> <p data-bbox="240 598 1489 757">115.76(b): Policy 3.003 Misconduct mandates misconduct violation of any law, Sheriff's Office General Order, County policy, Civil Service rule, Departmental procedures or orders by memorandum; neglect of duty; or any conduct or action which is detrimental to the good order and discipline of the Sheriff's Office and/or which tends to give the community or components of the criminal justice system a negative and/or unfavorable inmate of the Sheriff's Office or County of Solano may result in discipline, up to and including termination.</p> <p data-bbox="240 763 1445 824">Agency reports that over the past 12 months no staff member has violated Agency's sexual abuse or sexual harassment policies.</p> <p data-bbox="240 855 1489 1048">115.76(c): Policy GO 3.003 Misconduct mandates Definition of Misconduct is the violation of any law, Sheriff's Office General Order, County policy, Civil Service rule, departmental procedures or orders by memorandum; neglect of duty; or any conduct or action which is detrimental to the good order and discipline of the Sheriff's Office. Policy ends with "Any acts found to be a violation of this General Order may result in discipline up to and including termination. Agency reports that in the past 12 months, no staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies.</p> <p data-bbox="240 1079 1493 1308">115.76(d): Policy 5.041 PREA mandates all terminations of employment 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. Agency conducts both administrative and criminal investigations. Agency is a law enforcement agency, therefore this Standard provision is met. Agency reports that in the past 12 months, no staff from the facility has been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies.</p> <p data-bbox="240 1339 1334 1366">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.76.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 210 453 237">Auditor Discussion</p> <p data-bbox="244 271 1493 566">115.77(a): Policy 5.041 mandates that "All sexual abuse allegations shall be thoroughly investigated, and where appropriate, criminal prosecution and/or disciplinary action shall result. 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. Agency is a law enforcement body who investigates both criminal and administrative sexual abuse/harassment cases. By choosing to work in a custodial environment, an employee acknowledges and accepts the probability that inappropriate and socially deviant behavior from others may be experienced. Inappropriate sexual conduct from the inmate population will not be tolerated, and will be reported and result in disciplinary action in an attempt to eliminate and reduce repeat behavior. Agency reports that over the past 12 months, no contractor or volunteer have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.</p> <p data-bbox="244 600 1474 656">115.77(b): Agency reports that no contractor or volunteer was reported to law enforcement for engaging in sexual abuse of inmates.</p> <p data-bbox="244 667 1465 790">Policy 5.041 mandates that "All sexual abuse allegations shall be thoroughly investigated, and where appropriate, criminal prosecution and/or disciplinary action shall result. 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."</p> <p data-bbox="244 801 1481 891">Interview with Facility Commander indicates that in the case of a contractor or volunteer being placed under investigation for sexual misconduct, Agency will pull the gate clearance pending outcome of the investigation, reassess clearance reinstatement upon conclusion of the investigation.</p> <p data-bbox="244 925 1334 947">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.77.</p>

115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Policy 15.002 Inmate Rules and Discipline Reporting Rule Violations mandates Formal discipline requires an incident report be entered into the Inmate Management System (IMS). The supervisor will review reports for completeness and accuracy prior to posting into the Inmate Management System. If complete, the report will be approved by the appropriate supervisor and the officer shall post the report into the Inmate Management System. A hearing shall be scheduled within 72 hours of report entry, and a copy of the incident report and rights to a hearing will be given to the inmate(s) involved. The 72 hour time frame may be extended depending on the complexity of the issues and the need for more information. A hearing will be conducted by a Classification Officer. The hearing cannot be scheduled until 24 hours have elapsed from the time the inmate receives the report and rights to a hearing. This will be documented in the computer. The inmate has the right to waive the 24-hour preparation period. This must also be documented. The officer will document all minor and major violations handled on a formal basis in the inmate management system. Discipline/Incident Reports prepared by staff members will include, but not limited to:</p> <ol style="list-style-type: none"> a. Specific rules violated b. A formal statement of the charge c. An explanation of the event, which will include who was involved, what transpired, and the time and location of occurrence d. Any unusual inmate behavior e. Staff witness/inmate witness f. Disposition of an physical evidence g. Any immediate action taken including the use of force h. Reporting staff members, date and time report is made. <p>Agency reports that over the past 12 months there have been no administrative or criminal inmate on inmate sexual abuse at the Claybank facility.</p> <p>115.78(b): Disciplinary procedures and sanctions are outlined in the Inmate Rule Book. Policy 15.003 mandates that facilities will establish authority, guidelines, and time schedules for facility disciplinary procedures to provide fair and impartial hearings and corrective dispositions within pre-determined limitations to those found guilty of not conforming to facility rules and regulations.</p> <p>Interview with Facility Commander indicates that disciplinary sanctions shall be commensurate with the nature and circumstances of the abuse committed. Sanctions are outlined in the Inmate Rule Book.</p> <p>115.78(c): Policy 15.003 Disciplinary Hearing and Basic Rules mandates the disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed for PREA incidents.</p> <p>Interview with Facility Commander indicates disciplinary process considers if an inmate's mental disabilities may have contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p>115.78(d): Agency reports that the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. The facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.</p> <p>Interview with Medical and Mental Health Staff indicates that Agency may offer therapy for sexual predators on a voluntary basis when available. Agency is in the process of developing a mental health unit which addresses those concerns. Agency is currently addressing these concerns on a case by case basis.</p> <p>115.78(e): Policy 15.003 Disciplinary Hearing and Basic Rules mandates that an inmate may be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact.</p> <p>115.78(f): Policy 15.003 Disciplinary Hearing and Basic Rules mandates that the Sheriff's Office prohibits disciplinary action for a report of sexual abuse made in good faith and based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence to substantiate the allegation.</p> <p>115.78(g): Both the Agency and the Penal Code prohibits all sexual activity between inmates. This prohibition is outlined in the Inmate handbook.</p> <p>PREA Policy 5.041 mandates that "By choosing to work in a custodial environment, an employee acknowledges and accepts the probability that inappropriate and socially deviant behavior from others may be experienced. Inappropriate sexual conduct from the inmate population will not be tolerated, and will be reported and result in disciplinary action in an attempt to eliminate and reduce repeat behavior."</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.78.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 786 300">115.81 (a): N/A - Facility is a County Jail, not a Prison</p> <p data-bbox="242 329 786 358">115.81 (b): N/A - Facility is a County Jail, not a Prison</p> <p data-bbox="242 387 1490 448">115.81(c): Policy Wellpath PREA PnP-3-1 mandates that inmates receive a 14 Day Health Assessment and Annual Physical Exam:</p> <p data-bbox="242 477 1490 703">6.9.1. All patients will be screened within 14 days of intake for risk potential and/or history of sexual victimization or abusiveness and need for treatment as a component of the health history and assessment conducted by qualified health care staff. Prior facility health records, when applicable, will be reviewed for history of sexual victimization or abusiveness history and need for treatment as a component of the health history and assessment conducted by qualified health care staff. Prior facility health records, with applicable, will be reviewed for evidence of sexual victimization or abusiveness history. Agency reports there have been no reports of a history of sexual abuse during intake risk screening over the past 12 months. .</p> <p data-bbox="242 732 1442 792">6.9.2. Longer-stay patients will be screened for recent signs/history of victimization or abusiveness as part of the annual physical exam by qualified health care staff</p> <p data-bbox="242 822 1474 882">6.9.3. Patients exhibiting or self-reporting physical or mental health concerns related to sexual victimization or abusiveness shall be referred to a qualified medical or mental health professional for follow-up evaluation.</p> <p data-bbox="242 911 1497 1077">In all cases, health care staff will obtain consent to release all information regarding sexual abuse, that occurred in the community, to essential personnel who will investigate, treat, and manage the patient's care. Patients exhibiting or self-reporting physical or mental health concerns related to sexual victimization or abusiveness shall be referred to a qualified medical or mental health professional for follow-up evaluation. Agency reports that in the past 12 months, there is no report of inmates who disclosed prior victimization during screening.</p> <p data-bbox="242 1106 1458 1272">115.81(d): CFMG Rape & Sexual Assault Policy mandates all information related to sexual victimization and abusiveness that occurred in the institutional setting will be strictly limited to medical and mental health practitioners and other staff as required by Federal, State, or local law, to inform treatment plans and security management decisions, including housing, bed, work, education and programming assignments. Medical and Mental Health records are electronically secured to the practitioners access code.</p> <p data-bbox="242 1279 1481 1368">Policy Wellpath PREA PnP mandates that "Patients exhibiting or self-reporting physical or mental health concerns related to sexual victimization or abusiveness shall be referred to a qualified medical or mental health professional for follow-up evaluation."</p> <p data-bbox="242 1397 1497 1525">115.81 (e): Wellpath Policy PREA PnP-3-1 mandates that. "Consent of the patient, 18 years of age or older, is required before reporting an incident of sexual abuse that occurred prior to incarceration, except when the incident occurred in another correctional institution or in the event that the patient is under 18 years of age, as permitted by law. At the initiation of services with medical or mental health providers, all patients are informed of this duty to report."</p> <p data-bbox="242 1532 1481 1861">CFMG Rape & Sexual Assault Policy mandates that Medical and Mental Health practitioners must obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18. Agency provided Auditor with a copy of a PREA Acknowledgement of Mandatory Reporting and Consent Form which informs inmates of practitioners mandatory reporting responsibilities under the law and limitations of their confidentiality. This form must be signed by both Medical/Mental Health Staff and the client to be treated. Agency reports that in the past 12 months, there is no report of inmates who disclosed prior victimization during screening. Interview with Medical and Mental Health staff indicates they obtain informed consent from inmates before reporting about prior sexual victimization that did not occur in an institutional setting in their treatment notes. Medical and Mental Health practitioners indicate the Solano County Jail does not house inmates under the age of 18 and practitioners do not process or treat that age group. inmates under the age of 18 years are housed at Juvenile Hall.</p> <p data-bbox="242 1890 1337 1919">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.81.</p>

115.82	<p>Access to emergency medical and mental health services</p> <p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>115.82 (a): Agency reports that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Wellpath PREA PnP mandates that "All screening, assessment, evaluation findings, referrals and treatment plans shall be documented in the patient's health record." No inmate required these services over the past 12 months. Agency provided auditor with a copy of the PREA Duty to Report. Interview with Medical and Mental Health staff indicates that inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. This treatment occurs immediately. The nature and scope of these services are determined according to the practitioners professional judgment. There are no inmates housed at the Claybank facility who reported sexual abuse.</p> <p>115.82 (b): Agency reports that If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners. 1st Responders and/or immediate supervisors notifies the appropriate medical and mental health practitioners when a report of recent abuse is made. The 1st Responder protocol is initiated when custody or non-custody staff is notified of a report of sexual abuse is made and the 1st Responder Protocol and Coordinated Response is initiated. Interview with Security and Non-Security staff 1st Responders provided the same information during the interview and both provided auditor with copy of their 1st responder cards they are mandated to carry while on duty per Agency mandate. This mandate exceeds Standard 115.82(b).</p> <p>115.82 (c): Wellpath PREA PnP-3-1 mandates that "Prophylactic treatment and follow-up care for sexually transmitted or other communicable diseases (e.g., HIV, Hepatitis B) are offered to all victims, as appropriate. Emergency contraception is available to female victims of sexual abuse." Interview with Medical and Mental Health Staff indicates that victims of sexual abuse or offer timely information about access to emergency contraception and sexually transmitted infection prophylaxis. They are also offered family information about access emergency contraception and sexually transmitted infection prophylaxis during the SAFE/SANE assessment.</p> <p>115.82 (d): Wellpath PREA PnP-3-1 mandates that "Treatment services are provided free of charge to every victim of sexual abuse, regardless of whether the victim discloses the name of the abuser or fails to cooperate with any investigation arising out of the incident."</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.82.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p data-bbox="240 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 210 451 237">Auditor Discussion</p> <p data-bbox="240 273 1489 432">115.83 (a): Policy Wellpath PREA PnP 3-1 mandates that "Wellpath has a zero tolerance policy with regard to sexual abuse, sexual harassment, and sexual misconduct. All allegations sexual abuse, sexual harassment, sexual misconduct with or without consent, or staff voyeurism will be promptly and thoroughly reported to the facility administration and will be handled in compliance with state and federal law. Prompt and appropriate health intervention will take place in the event of a sexual abuse in an effort to minimize medical and psychological trauma."</p> <p data-bbox="240 463 1485 822">115.83 (b): Policy Wellpath PREA PnP 3-1 mandates that evaluation and treatment plans include "Prophylactic treatment and follow-up care for sexually transmitted or other communicable diseases (e.g., HIV, Hepatitis B) are offered to all victims, as appropriate. Emergency contraception is available to female victims of sexual abuse. Continued evaluation and treatment of medical and mental health needs related to sexual abuse will be provided in accordance with the patient's desire for treatment and the community standard of care. Services may be provided through sick call, chronic care clinics, and regular annual health examinations. If needed, a treatment plan will be developed regarding any additional medical follow-up required.6.19.4. Mental health staff will assess need for crisis intervention, and provide those services as necessary. Mental health staff will offer on-going follow-up services. If the patient refuses such services, the patient will be informed that a mental health staff member will follow-up in 14 days to determine if the patient is functioning adequately and offer any follow-up services. All encounters will be documented in the patient's health record, including any refusals of follow-up services.</p> <p data-bbox="240 831 1469 925">When necessary and appropriate, post-release information and instructions will be provided for continuity of care. All discharge planning actions/instructions will be documented. One copy will be given to the patient and the other copy will be filed in the patient's health record."</p> <p data-bbox="240 934 1473 1028">Interview with Medical and Mental Health staff indicates that evaluation and treatment of inmates who have been victimized includes interventions, treatment, trauma assessment, therapeutic planning and referral resources. There were no inmates who reported a sexual abuse housed in the Claybank Facility.</p> <p data-bbox="240 1059 1398 1117">115.83 (c): Interview with Medical and Mental Health Staff indicate they provide medical and mental health services consistent with the community level of care.</p> <p data-bbox="240 1149 1445 1243">115.83 (d): Policy Wellpath PREA PnP -3-1 mandates that "Prophylactic treatment and follow-up care for sexually transmitted or other communicable diseases (e.g., HIV, Hepatitis B) are offered to all victims, as appropriate. Emergency contraception is available to female victims of sexual abuse."</p> <p data-bbox="240 1252 1094 1279">There were no inmates who reported a sexual abuse housed in the Claybank Facility.</p> <p data-bbox="240 1310 1481 1503">115.83 (e): Claybank Detention Center is a co-ed facility. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. Policy Wellpath PREA PnP -3-1 mandates that "Emergency contraception is available to female victims of sexual abuse."There were no inmates who reported a sexual abuse housed in the Claybank Facility. Interview with Medical and Mental Health staff indicate that should pregnancy result from sexual abuse while incarcerated, victims are are provided timely information and access to all lawful pregnancy related services when staff is notified.</p> <p data-bbox="240 1534 1493 1693">115.83 (f): Policy Wellpath PREA PnP -3-1 mandates that "Prophylactic treatment and follow-up care for sexually transmitted or other communicable diseases (e.g., HIV, Hepatitis B) are offered to all victims, as appropriate." There were no inmates who reported a sexual abuse housed in the Claybank Facility. Interview with Medical and Mental Health staff indicate that the above services do not require an inmate's participation as a condition of access to programming or other benefits.</p> <p data-bbox="240 1724 1465 1850">115.83 (g): Policy Wellpath PREA PnP -3-1 mandates that "Treatment services are provided free of charge to every victim of sexual abuse, regardless of whether the victim discloses the name of the abuser or fails to cooperate with any investigation arising out of the incident." There were no inmates who reported a sexual abuse housed in the Claybank Facility.</p> <p data-bbox="240 1881 791 1908">115.83 (h): N/A - Facility is a County Jail, not a Prison.</p> <p data-bbox="240 1939 1334 1966">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.83.</p>

115.86	Sexual abuse incident reviews
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 1484 432">115.86(a): Policy 5.041 PREA mandates the "Sheriff's Office shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. Every effort will be made to ensure the review occurs within 30 days of the conclusion of the investigation. Facility reports that in the past 12 months, there were no criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents."</p> <p data-bbox="242 461 1474 555">115.86(b): Policy 5.041 PREA mandates that the "The Sheriff's Office shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. Every effort will be made to ensure the review occurs within 30 days of the conclusion of the investigation."</p> <p data-bbox="242 584 1481 678">115.86(c): Policy 5.041 PREA mandates that "A team identified to conduct the review shall consist of a member at or above the rank of Lieutenant, a supervisor not involved in the investigation, one of the investigators of the case and medical and/or mental health professional."</p> <p data-bbox="242 685 1461 779">Interview with Facility Captain indicates Incident Review Team is comprised of Facility Commander, Facility Lieutenant, Investigator, Classification representative and any other staff members who are involved in the case. Incident Reviews are conducted monthly.</p> <p data-bbox="242 808 1465 902">115.86(d): Policy 5.041 PREA mandates that "The review team shall consider the following information and complete a report of findings and any recommendation for improvement of handling such cases and submit to the Facility Commander and the PREA Coordinator.</p> <ol data-bbox="242 909 1465 1205" style="list-style-type: none"> 1. Potential changes to policy or practice necessary to better prevent, detect or respond to sexual abuse. 2. Potential motivation of the event by the perpetrator or victim's race, ethnicity, sexual orientation, gang affiliation, or other group dynamics at the facility. 3. Examine the area in the facility where the incident occurred to assess whether physical barriers in the area may enable abuse. 4. Assess the adequacy of staffing levels in that area during different shifts. 5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. 6. Prepare a report of its findings and any recommendations for improvement and submit such report to the Facility Commander and PREA Compliance Manager. <p data-bbox="242 1234 1465 1294">Interview with Facility Commander, PREA Compliance Manager and Incident Review Team member indicates the Incident Review Team considers all 6 criteria outlined in Standard provision 115.86(d).</p> <p data-bbox="242 1323 1465 1384">115.86(e): Agency reports that the facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p data-bbox="242 1469 1334 1498">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.86.</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.87 (a): Policy 5.041 PREA mandates the "The Sheriffs Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument and set of definitions, and shall aggregate the incident-based sexual abuse at least annually."</p> <p>115.87 (b): Policy PREA 5.041 mandates that "The Sheriffs Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument and set of definitions, and shall aggregate the incident-based sexual abuse at least annually."</p> <p>115.87 (c): Policy PREA 5.041 mandates that "The Sheriffs Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument and set of definitions, and shall aggregate the incident-based sexual abuse at least annually."</p> <p>115.87 (d): Policy PREA 5.041 mandates that "The Sheriffs Office shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument and set of definitions, and shall aggregate the incident-based sexual abuse at least annually. Review all data collected and compiled in order to assess and improve the effectiveness of it sexual abuse prevention, detection, and response policies, practices, and training, by:</p> <ol style="list-style-type: none"> 1. Identifying problem areas 2. Taking corrective action on an ongoing basis 3. Preparing an annual report of its findings and corrective actions for each facility as well as the agency as a whole. <p>115.87 (e): N/A - Agency does not contract for the confinement of inmates.</p> <p>115.87 (f): N/A - Agency reports that DOJ has not requested agency data.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.87.</p>

115.88	Data review for corrective action
	<p data-bbox="242 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 237">Auditor Discussion</p> <p data-bbox="242 273 1469 432">115.88 (a): Policy PREA 5.041 mandates that it conducts a "Review all data collected and compiled in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, by: 1. Identifying problem areas 2. Taking corrective action on an ongoing basis 3. Preparing an annual report of its findings and corrective actions for each facility as well as the agency as a whole."</p> <p data-bbox="242 463 1485 757">Interview with Agency Head, PREA Coordinator and PREA Compliance Manager indicates that Interview with Agency Head, PREA Coordinator and PREA Compliance Manager indicates Agency reviews all data collected and aggregate pursuant to PREA Standards by identifying problem areas, taking corrective action and preparing an Annual Report of the findings. They see reviews data collected in aggregated pursuant to standard 115.87 in order to assess and improve the effectiveness of a sexual abuse prevention, detection, and response policies, and training. The agency prepares an annual report of findings from the data review and any corrective actions for each facility as well as the agency as a whole. Frequency manager in the case that daddy used it to see if there's a need for additional staffing, policy / procedures updates, enhanced video updates or mirrors. The 2020 Solano County Annual PREA Report is currently available on the Agency website as verified by the auditor.</p> <p data-bbox="242 788 1493 947">115.88 (b): Policy PREA 5.041 mandates that "An annual report shall be prepared in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse. The 2020 Solano County Annual PREA Report is currently available on the Agency website and verified by the auditor.</p> <p data-bbox="242 978 1469 1173">115.88 (c): Policy PREA 5.041 mandates that "an annual report shall be prepared and submitted to the PREA Coordinator by the last day in April that compiles the data for the previous calendar year, compares it to the previous year's data, and outlines any corrective actions needed or taken in addressing sexual abuse. The annual report shall be approved by the agency head and made readily available to the public through the agency website." Interview with the Agency Head indicates he approves Annual Reports prior to their placement on the Agency website. The 2020 Solano County Annual PREA Report is currently available on the Agency website and verified by the auditor.</p> <p data-bbox="242 1205 1469 1431">115.88 (d): Policy PREA 5.041 mandates that "Specific material may be redacted from the report when publication would present a clear and specific threat to the safety and security of a facility, but the report must indicate the nature of the material redacted." Review of the 2019 Annual Report verifies a narrative where the Agency indicates the nature of the material redacted on page #2 of the report. Interview with the PREA Coordinator indicates that public identifying information is redacted from the report and the agency also indicates, in writing, the nature of the material redacted in the annual report. The 2020 Solano County Annual PREA Report is currently available on the Agency website and verified by the auditor.</p> <p data-bbox="242 1462 1334 1489">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.88.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.89 (a): Interview with PREA Coordinator indicates Agency reports that incident-based and aggregate data are securely retained by the PREA Coordinator.</p> <p>115.89 (b): Policy 5.041 PREA mandates an annual report shall be prepared and submitted to the PREA Coordinator by the last day in April that compiles the data for the previous calendar year, compares it to the previous year's data, and outlines any corrective actions needed or taken in addressing sexual abuse.</p> <ol style="list-style-type: none"> 1. The annual report shall be approved by the agency head and made readily available to the public through the agency website. 2. Specific material may be redacted from the report when publication would present a clear and specific threat to the safety and security of a facility, but the report must indicate the nature of the material redacted. 3. Before making aggregated sexual abuse data publicly available, personal identifiers shall be removed. <p>115.89(c): Policy 5.041 PREA mandates "specific material may be redacted from the report when publication would present a clear and specific threat to the safety and security of a facility, but the report must indicate the nature of the material redacted. Review of the 2019 Annual Report verifies compliance with this Standard provision. Copies of the reports of the completed investigation shall be forwarded to the PREA Coordinator, who must document the incident to the US Department of Justice using form SSV-1A. A copy of this form shall be maintained by the agency for no less than ten years. Review of the 2019 Annual Report verifies compliance with Standard provision 115.89(c).</p> <p>115.89(d): Policy 5.041 PREA mandates copies of the reports of the completed investigation shall be forwarded to the PREA Coordinator, who must document the incident to the US Department of Justice using form SSV-1A. A copy of this form shall be maintained by the agency for no less than ten years. 9/9/21 – PREA Compliance Manager provided auditor with a copy of the Lexipol copy of the Solano County Sheriff's Office Custody Policy Manual regarding 606.15 Data Reviews, which states:</p> <p>606.15 RECORDS</p> <p>All case records and reports associated with a claim of sexual abuse and sexual harassment, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment or counseling shall be retained in accordance with confidentiality laws. The Office shall retain all written reports from administrative and criminal investigations pursuant to this policy for as long as the alleged abuser is held or employed by the Office, plus five years (28 CFR 115.71). All other data collected pursuant to this policy shall be securely maintained for at least 10 years after the date of the initial collection, unless federal, state or local law requires otherwise (28 CFR 1) 115.89.</p> <p>Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.89.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 456">115.401(a): This is the 1st year of the current cycle. Agency has three facilities and one facility has been audited in the previous cycle. Auditor has been provided access to observe all areas of the facility, request and receive copies of relevant documents included electronically stored information and conduct private interviews with inmates and staff. Inmates have the ability to correspond with the auditor in the same manner as if they were communicating with legal counsel. This arrangement was agreed to during the pre-audit phase of the audit.</p> <p data-bbox="229 456 1509 568">115.401(b): Agency started PREA compliance audits in 2017 and have maintained PREA audits for each of their facilities for each cycle. Agency has recently completed approved a 3 year contract with an independent PREA auditing agency to maintain PREA audits for each facility throughout this current cycle.</p> <p data-bbox="229 568 1509 680">115.401(h): Auditor has been provided access to observe all areas of the facility, request and receive copies of relevant documents included electronically stored information and conduct private interviews with inmates and staff. Inmates have the ability to correspond with the auditor in the same manner as if they were communicating with legal counsel.</p> <p data-bbox="229 680 1509 882">115.401(i): Auditor has been provided access to observe all areas of the facility, request and receive copies of relevant documents included electronically stored information and conduct private interviews with inmates and staff. Inmates have the ability to correspond with the auditor in the same manner as if they were communicating with legal counsel. Agency and auditor are using the OAS to complete the PREA Audit. Both Agency and auditor have uploaded documentation in support of PREA compliance required for determination of PREA Standard compliance.</p> <p data-bbox="229 882 1509 1039">115.401 (m): Agency has permitted auditor to conduct interviews with inmates housed in the facility who have been randomly selected by the auditor. Interviews were conducted in a private setting, either in multi-purpose rooms or interview rooms. At no time during the interviews were staff or other inmates allowed in the space while interviews were being conducted.</p> <p data-bbox="229 1039 1509 1308">115.401 (n): Inmates have the ability to correspond with the auditor in the same manner as if they were communicating with legal counsel. No written correspondence was submitted to auditor before or after the onsite audit, prior to the interim report. During the onsite review, auditor noted that the Notice of Auditor was posted in all housing units, work areas and treatment areas such as medical. Notice of auditor and 3rd party PREA poster and Notice of Auditor was also posted in the visiting area and entrance lobby.</p> <p data-bbox="229 1308 1509 1350">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.401.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 210 453 237">Auditor Discussion</p> <p data-bbox="240 271 1436 365">115.403(f): Review of the Agency's website identifies the Final PREA Audit Reports for the 2017 Stanton Facility, 2018 Claybank Facility, and 2020 Stanton Facility. The Final PREA Audit Report for the 2019 Main Jail (JCDF) Facility is not present on the website, only the Annual Report and the PREA Audit Final Report Cover letter.</p> <p data-bbox="240 396 1484 456">Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.403(f), and corrective action is required.</p> <p data-bbox="240 488 609 515"><u>Corrective Action Recommended:</u></p> <p data-bbox="240 546 1469 640">Review of the DRAFT 4/2/19 Justice Center Detention Facility (JCDF) includes the Facility Overview, staffing on each shift, visiting, classification, inmate population, inmate programs, medical and dental services, training, PREA case statistics, staffing on each shift and a complete staffing summary.</p> <ol data-bbox="240 669 1490 730" style="list-style-type: none"> 1. Agency to upload the 2019 Main Jail (JCDF) Final PREA Report to the Agency website. To comply with PREA Standard 115.403(f). <p data-bbox="240 761 1458 855">Auditor will conduct a 90-day status review on 12/19/22 to determine if corrective actions have been implemented and are institutionalized. Corrective action recommendations must be implemented by the end of the 180-day Corrective Action Period: 3/27/22.</p> <p data-bbox="240 943 654 969"><u>Corrective Action Completion 10/4/21:</u></p> <ol data-bbox="240 1001 1426 1061" style="list-style-type: none"> 1. On 10/4/21, Agency provided auditor with a copy of the 2019 Justice Center Detention Facility PREA Audit Summary Report. Auditor verified the 2019 PREA Audit Report has been uploaded to the Sheriff's website. <p data-bbox="240 1093 1436 1187">The agency/facility has met the requirements of Standard provision(s) 115.403(f) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provision and complies with Standard 115.403.</p>

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.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
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 that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

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 consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
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 with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
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 may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
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).)	na
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 Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
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 suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
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 information is not exploited to the inmate's detriment by staff or other inmates?	yes
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 present management or security problems?	yes

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 solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
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 anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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.)	yes
	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 abuse or sexual harassment or retaliation?	yes
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 response to an incident of sexual abuse?	yes
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 sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
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 of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

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).)	na

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.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

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

115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
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 sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na

115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	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 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes