

# PREA Facility Audit Report: Final

Name of Facility: Sarasota County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/25/2022

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: James Kenney	Date of Signature: 05/25/2022

AUDITOR INFORMATION	
Auditor name:	Kenney, James
Email:	jimkenney33@earthlink.net
Start Date of On-Site Audit:	05/10/2022
End Date of On-Site Audit:	05/12/2022

FACILITY INFORMATION	
Facility name:	Sarasota County Jail
Facility physical address:	2020 Main Street, Sarasota, Florida - 34237
Facility mailing address:	P.O. Box 4115, Sarasota, Florida - 34230-4115

Primary Contact	
Name:	Lt. Jay Doyle
Email Address:	jay.doyle@sarasotasheriff.org
Telephone Number:	941-400-7791

Warden/Jail Administrator/Sheriff/Director	
Name:	Major Brian Meinberg
Email Address:	brian.meinberg@sarasotasheriff.org
Telephone Number:	941-861-4105

Facility PREA Compliance Manager	
<b>Name:</b>	Jenna Dubose
<b>Email Address:</b>	jenna.dubose@sarasotasheriff.org
<b>Telephone Number:</b>	O: (941) 861-4730

Facility Health Service Administrator On-site	
<b>Name:</b>	Stephannie Trotter
<b>Email Address:</b>	stephannie.trotter@naphcare.com
<b>Telephone Number:</b>	941-861-4754

Facility Characteristics	
<b>Designed facility capacity:</b>	836
<b>Current population of facility:</b>	951
<b>Average daily population for the past 12 months:</b>	929
<b>Has the facility been over capacity at any point in the past 12 months?</b>	Yes
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	13-89
<b>Facility security levels/inmate custody levels:</b>	10
<b>Does the facility hold youthful inmates?</b>	Yes
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	249
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	154
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	511

AGENCY INFORMATION	
<b>Name of agency:</b>	Sarasota County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	2020 Main St., Sarasota , Florida - 34237
<b>Mailing Address:</b>	PO Box 4115, Sarasota, Florida - 34230
<b>Telephone number:</b>	941-400-7791

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

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Jay Doyle	<b>Email Address:</b>	jay.doyle@sarasotasheriff.org

SUMMARY OF AUDIT FINDINGS	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>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.</p>	
Number of standards exceeded:	
1	<ul style="list-style-type: none"> <li>• 115.71 - Criminal and administrative agency investigations</li> </ul>
Number of standards met:	
44	
Number of standards not met:	
0	

# POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-05-10
2. End date of the onsite portion of the audit:	2022-05-12

### Outreach

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

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	836
15. Average daily population for the past 12 months:	929
16. Number of inmate/resident/detainee housing units:	42
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	944
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	8
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	18
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	18

40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	4
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	5
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	36
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	18
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	6
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	16
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The auditor confirmed through a review of inmate records that there were no transgender inmates in custody at the time of the audit. The auditor reviewed records of inmates held in confinement and reviewed records of inmates who had reported sexual abuse to confirm that no inmates were held in confinement due to the high risk for victimization. The auditor confirmed this through interviews with the PREA coordinator and classification.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	249
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	511
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	154
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.

# INTERVIEWS

## Inmate/Resident/Detainee Interviews

### Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The auditor selected inmates from different areas of the facility, ensuring to select males and females, youthful inmates, and inmates with different races and ages.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.

### Targeted Inmate/Resident/Detainee Interviews

58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	18
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	5

60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	3
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input checked="" type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The auditor confirmed through a review of inmate records that there were no transgender inmates in custody at the time of the audit. The auditor confirmed this through interviews with the PREA coordinator and classification.

67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	2
68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	3
69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The auditor reviewed records of inmates held in confinement and reviewed records of inmates who had reported sexual abuse to confirm that no inmates were held in confinement due to the high risk for victimization. The auditor confirmed this through interviews with the PREA coordinator and classification.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
<b>Staff, Volunteer, and Contractor Interviews</b>	
<b>Random Staff Interviews</b>	
71. Enter the total number of RANDOM STAFF who were interviewed:	16
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes  <input type="radio"/> No



74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
<b>Specialized Staff, Volunteers, and Contractor Interviews</b>	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	26
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Agency contract administrator</li> <li><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</li> <li><input checked="" type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</li> <li><input checked="" type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</li> <li><input checked="" type="checkbox"/> Medical staff</li> <li><input checked="" type="checkbox"/> Mental health staff</li> <li><input checked="" type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</li> <li><input checked="" type="checkbox"/> Administrative (human resources) staff</li> <li><input checked="" type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting criminal investigations</li> <li><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</li> <li><input checked="" type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</li> <li><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</li> <li><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</li> <li><input checked="" type="checkbox"/> First responders, both security and non-security staff</li> <li><input checked="" type="checkbox"/> Intake staff</li> <li><input checked="" type="checkbox"/> Other</li> </ul>
<p><b>If "Other," provide additional specialized staff roles interviewed:</b></p>	<p>Grievance coordinator, Maintenance</p>
<p><b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>a. Enter the total number of CONTRACTORS who were interviewed:</b></p>	<p>3</p>

<p><b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Security/detention</p> <p><input checked="" type="checkbox"/> Education/programming</p> <p><input checked="" type="checkbox"/> Medical/dental</p> <p><input checked="" type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
<p><b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b></p>	<p>No text provided.</p>

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

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

<p><b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>88. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>

### Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
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## SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

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

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	5	0	3	2
Staff-on-inmate sexual abuse	3	0	1	2
<b>Total</b>	<b>8</b>	<b>0</b>	<b>4</b>	<b>4</b>

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	13	0	13	0
Staff-on-inmate sexual harassment	2	0	2	0
<b>Total</b>	<b>15</b>	<b>0</b>	<b>15</b>	<b>0</b>

### Sexual Abuse and Sexual Harassment Investigation Outcomes

#### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	1	1	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	1	1	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	4	1
<b>Staff-on-inmate sexual abuse</b>	0	3	0	0
<b>Total</b>	0	3	4	1

**Sexual Harassment Investigation Outcomes**

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	9	4	0
<b>Staff-on-inmate sexual harassment</b>	0	2	0	0
<b>Total</b>	0	11	4	0

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

**Sexual Abuse Investigation Files Selected for Review**

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	8
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	5
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>Staff-on-inmate sexual abuse investigation files</b>	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	15

<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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**Inmate-on-inmate sexual harassment investigation files**

<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>13</p>
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<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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**Staff-on-inmate sexual harassment investigation files**

<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
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<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>
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**SUPPORT STAFF INFORMATION**

**DOJ-certified PREA Auditors Support Staff**

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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**Non-certified Support Staff**

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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**AUDITING ARRANGEMENTS AND COMPENSATION**

<p>121. Who paid you to conduct this audit?</p>	<p><input checked="" type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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## 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><b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Corrections Organizational Chart</i></li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. PREA coordinator</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.11(a).</b> The Sarasota County Sheriff's Office has adopted a comprehensive written policy that mandates zero-tolerance toward all types of sexual abuse and sexual harassment. The agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>, which outlines their zero-tolerance sexual abuse policy. The directive clearly describes the agency's approach to the prevention, detection, and response to sexual assault incidents and establishes immediate reporting guidelines of such incidents. The directive states that the agency has established a standard for the detection, prevention, reduction, and punishment of sexual abuse, sexual contact, and sexual harassment of inmates. The directive also provides the definitions for sexual abuse and sexual harassment that are consistent with the prohibited behaviors in the PREA standards (p. 7). Based upon this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.11(b).</b> The agency has designated an agency wide PREA coordinator, Lieutenant Jay Doyle, who reports directly to the Corrections Operations Bureau Commander. The <i>Corrections Organizational Chart</i> was provided for review and shows the PREA coordinator's position as a direct report to the Operations Bureau Commander, only one step from the Jail Commander. There is no question as to the authority level of the PREA coordinator at this agency.</p> <p>The auditor interviewed the PREA coordinator and confirmed the functions of his position for PREA compliance, retaliation monitoring, review and monitoring of vulnerable inmates, and reporting of PREA data. The auditor worked directly with the PREA coordinator for this audit and was able to assess his knowledge and authority level. Based on this interview, the organizational chart, and my contact with the PREA coordinator, the auditor believes he has both the time and authority necessary. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.11(c).</b> The Sarasota County Correctional Facility is self-contained in one building and is not mandated by this provision to assign a PREA compliance manager. The auditor interviewed the PREA coordinator and determined that he has adequate time and authority to maintain the PREA functions, so a PREA compliance manager is not needed for the agency. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="242 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li data-bbox="277 349 906 376">1. Documents: <i>(Policies, directives, forms, files, records, etc.)</i> <ol style="list-style-type: none"> <li data-bbox="341 385 440 412">1. None</li> </ol> </li> <li data-bbox="277 421 432 448">2. Interviews: <ol style="list-style-type: none"> <li data-bbox="341 456 692 483">1. Agency Contract Administrator</li> </ol> </li> </ol> <p data-bbox="242 510 501 537"><b>Findings (by provision):</b></p> <p data-bbox="242 566 1490 627"><b>115.12(a).</b> The agency did not provide any policy or procedure relative to this standard. In the PAQ, the agency stated there were no contracts currently in place for the housing of Sarasota County Correctional Facility inmates.</p> <p data-bbox="242 658 1490 786">Through an interview with the agency contract administrator, the auditor was able to confirm that the agency currently has no contracts for any other agency to house inmates for Sarasota County. Because there are no current contracts, the auditor was not able verify language in any executed contract. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 815 1490 1041"><b>115.12(b).</b> The auditor interviewed the agency contract administrator during the onsite audit, who indicated that any new contract entered into with any other agency for the housing of Sarasota County inmates will include a provision that requires the contractor to comply with the national standards to prevent, detect, and respond to prison rape under the Prison Rape Elimination Act (PREA). The contract must also provide for agency contract monitoring to ensure the contractor is complying with the PREA standards. The agency contract administrator confirmed that inmates will not be housed in any facility or with any entity that fails to provide proof of compliance with the PREA standards. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. CO 210.02 Review of Staffing Requirements</li> <li>3. Sarasota County Correctional Facility Staffing Plan Analysis 2022</li> <li>4. 2021 - 2022 Staffing Plan Review</li> <li>5. Shift Reports</li> <li>6. Supervisor Management Rounds Reports</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Agency Head</li> <li>3. Random Inmates</li> <li>4. Random Staff</li> <li>5. Specialized Staff</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Control rooms (electronic monitoring)</li> <li>2. Program area</li> <li>3. Housing units</li> <li>4. Kitchen</li> <li>5. Health services</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.13(a).</b> In the PAQ, the agency provided the auditor a copy of the <i>Sarasota County Correctional Facility Staffing Plan Analysis 2022</i>. The document includes the staffing level guidelines for the Sarasota County Correctional Facility (SCCF) and the breakdown of video monitoring technology for the facility. The plan includes a review of the supervision for the institution.</p> <p>The staffing plan mandated in this provision must take into account 11 considerations:</p> <ol style="list-style-type: none"> <li>1. Provision 115.13(a)(1) – Generally accepted detention and correctional practices – The Sarasota County Correctional Facility assigns staff in a manner consistent with guidelines established by the Florida Model Jail Standards and Florida Corrections Accreditation Commission. The jail seeks to always exceed standards concerning effective and efficient supervision of inmates.</li> <li>2. Provision 115.13(a)(2) – Any judicial findings of inadequacy – The Sarasota County Correctional Facility has not had any judicial findings of inadequacy. There are no current lawsuits/settlement agreements.</li> <li>3. Provision 115.13(a)(3) – Any findings of inadequacy from Federal investigative agencies – The Sarasota County Correctional Facility has not had any Federal findings of inadequacy by any Federal investigative agency.</li> <li>4. Provision 115.13(a)(4) – Any findings of inadequacy from internal or external oversight bodies – The Sarasota County Correctional Facility performed its latest Florida Model Jail Standards compliance inspection in 2022. There were no findings of inadequacy from this or any other internal or external oversight bodies.</li> <li>5. Provision 115.13(a)(5) – All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated) – The Sarasota County Correctional Facility has continuously added video monitoring to housing and program areas, removing any existing or potential areas where an inmate may be isolated. considered blind spots in all housing areas while also considering inmate privacy for toilet and shower areas. 81 additional cameras have been added throughout the facility since 2019, bringing the total cameras to 430. The current environment leaves a very minimal likelihood for staff and inmates to be isolated in the facility.</li> <li>6. Provision 115.13(a)(6) – The composition of the inmate population – The Sarasota County Correctional Facility houses male and female adult inmates, mainly while they await their court appearances. A small percentage of inmates are sentenced to serve time in the county jail, with a sentence of one year or less. The facility houses all inmates for this County, regardless of race, ethnic origin, sexual orientation, gender identity, and intellectual or physical disability. Vulnerable populations within the facility, which include lesbian, gay, bisexual, and transgender inmates, and inmates with mental illness or other disabilities, may be at high risk for victimization. Staffing is maintained at a level to provide safety and security for all</li> </ol>

inmates.

7. Provision 115.13(a)(7) – The number and placement of supervisory staff – The plan considers the placement of supervisors for the proper supervision of staff and safety of the inmates to ensure coverage for the security inspections and required facility rounds. A minimum of three (3) supervisors shall be on-duty during non-business hours to monitor housing and staff. This nominal level is sufficient coverage to ensure proper staff assignment to observe and monitor the inmate population. Up to fourteen (14) operations and support supervisors may be available during business hours.

8. Provision 115.13(a)(8) – Institution programs occurring on a particular shift – The Sarasota County Correctional Facility has sixty-eight (68) current Education, Health and Wellness, Mental Health, Relationship, Religious Services, and Vocational programs available to inmates as part of our dedication to our community-based Desistance, Re-entry, Recovery, and Re-Integration philosophy. Faith-based and recovery programs are provided seven (7) days per week. On-site and internet video visitation are available seven (7) days per week to maintain healthy family relationships for inmates. Video visitation monitors are accessible and available in all housing areas. Program and security staffing is sufficient to ensure no disruption to facility security or program access.

9. Provision 115.13(a)(9) – Any applicable State or local laws, regulations, or standards – Compliance with state mandated Florida Model Jail Standards (FMJS) are met or exceeded. No notable or life safety violations have been found during the yearly inspection. SCCF is also Florida Corrections Accreditation Commission (FCAC) certified.

10. Provision 115.13(a)(10) – The prevalence of substantiated and unsubstantiated incidents of sexual abuse – A review of the previous six (6) years has determined substantiated and unsubstantiated incidents show no remarkable pattern of inmates, staffing, facility areas, incidents motivated by race, gender, identity, or group dynamics. No changes to staffing, facility layout, technology, policies, or procedures are required.

11. Provision 115.13(a)(11) – Any other relevant factors – There are no other relevant factors at the Sarasota County Correctional Facility that affect its ability to detect, prevent, and respond to issues of sexual abuse, sexual assault, or sexual harassment of inmates.

The overall staffing of the facility is consistent with accepted practices and standards, and the auditor saw nothing in the plan or in the facility that would be inconsistent with that finding.

During the site review, the auditor found no areas of concern or blind spots in the facility. The auditor also noted adequate staffing throughout the institution, as well as an adequate number of supervisory staff. The auditor reviewed all areas, including the kitchen, laundry, program areas, medical and mental health, and all housing units. There are clearly visible cameras throughout the facility and the auditor could see where the facility had identified potential areas of concern and additional cameras were installed. This would support the assertion in the staffing plan that the facility has done an extensive review. The auditor visited the control rooms where staff actively monitor video within the facility. There appeared to be extensive coverage in all areas of the facility.

The auditor talked with several supervisors throughout the facility and witnessed their interactions with staff. It was apparent that there is ample supervisory coverage to ensure staff and inmate safety.

The auditor interviewed the Bureau Commander, the Major, during the onsite phase of the audit. The Major talked about the staffing plan and indicated the staffing plan is reviewed annually and updated based on a broad review with a team that includes the PREA coordinator. The Major explained the plan is based on several factors and nationally accepted guidelines for staffing coverage. Each of the four shifts has adequate staff to provide a safe environment leading to the prevention, detection, and reduction of sexual abuse of the inmate population. The video monitoring system is evaluated at least once per year to determine if the agency should make adjustments to better identify safety concerns. The Major confirmed the plan covers each of the 11 points required under this standard. To confirm compliance, the shift commanders review daily and weekly staffing reports and addresses any concerns immediately and forward those reports to the Major's office for additional review and approval. The auditor also interviewed the PREA coordinator, who confirmed the staffing plan considers each of the required points listed in this standard. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.13(b).** The agency reported in the PAQ there were no deviations from the staffing plan during the 12 months prior to the audit. However, during the onsite phase of the audit, the auditor determined that there were in fact several deviations to staffing plan. Most deviations were due to the ongoing national pandemic, as there were several instances of illnesses and quarantine. These deviations were filled with overtime and adjustments to staffing requirements of supervisors and support staff. Outside of the pandemic, deviations are usually due to vacation and sick time. These deviations are also filled using overtime.

During the onsite phase of the audit, the auditor interviewed the Major, who confirmed the documented deviations through the daily shift reports. The auditor was provided copies of the shift reports and noted the deviations below the required minimum staffing. The auditor could see how the facility corrected the deviation by requiring staff to work additional overtime

hours to cover shortages on each shift. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.13(c).** In the PAQ, the auditor was provided *CO 210.02 Review of Staffing Requirements*. The policy states, "These staffing summaries shall contain the courts and corrections division commander's report and recommendations for personnel changes needed to fulfill the correctional facility's mission and provide all programs, services, and supervision staffing for the correctional facility and the offender population while taking into consideration budget constraints." The auditor was provided a copy of the *2021 - 2022 Staffing Plan Review* in the PAQ. The annual review was completed in October 2021. The review indicated that no changes to the staffing plan were warranted based on the facility's inmate population, current staffing levels, physical plant, and the number and composition of sexual abuse allegations. The review did note the addition of 81 new cameras, bringing the total number of cameras deployed to 430. The annual review was completed by the PREA coordinator and a team of administrative staff and signed by the Bureau Commander.

The auditor interviewed the PREA coordinator, who confirmed the staffing plan is reviewed at a minimum of once per year. The annual review is then shared with the executive administration. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.13(d).** The auditor was provided a copy of *CO 440.03 Prison Rape Elimination Act (PREA)* in the PAQ. In the *Prevention* section, the policy states, "Supervisors / O.I.C. will make at least one unannounced round per shift to all posts. It is unauthorized for staff to alert other staff that a supervisor / O.I.C. is conducting rounds." The auditor was provided copies of several *Supervisor Management Rounds* reports, from various dates throughout the last 12 months. The auditor was able to view documented supervisory rounds in these logs at different times of the day and night throughout the facility.

During the onsite phase of the audit, the auditor interviewed 16 random inmates and each inmate stated that supervisors enter the housing units several times a day. When asked, inmates told the auditor that supervisors come in the units many times throughout the day and night. During interviews with 16 random staff members, staff stated that supervisors perform rounds daily and at different times. The auditor also interviewed supervisors during the onsite audit and confirmed that they are expected to enter each housing unit at least once per day to make rounds. Those rounds are required to be documented in the logs and are to be performed at random times so as not to be predictable. Also, during the site review, the auditor met supervisors in the housing units while they were performing their unannounced rounds. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.14	Youthful inmates
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. CO 330.02 Juvenile Intake, Housing and Release</li> <li>3. CO 310.16 Inmate Movement</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Youthful housing</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.14(a).</b> The auditor reviewed <i>CO 330.02 Juvenile Intake, Housing and Release</i>, which was provided in the PAQ. This policy outlines the requirements to house inmates within the Sarasota County Correctional Facility that are under age 18. The directive states, "Juvenile inmates shall not be placed in a housing unit where he/she will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area or sleeping quarters (p. 3)." Also, by Florida state law, and facility policy, staff are required to complete security rounds every 10 minutes, without exception.</p> <p>During the site review, the auditor toured the area utilized to house youthful inmates. The housing unit utilized is on a hallway with a total of four housing units. The unit on the back left is utilized to house the youthful inmates. The windows of the housing unit are covered to prevent adult inmates to look into the housing unit as well as to prevent the youthful inmates from looking outside the housing unit. A corrections deputy is posted inside the housing unit to provide safety and security for the youthful inmates housed there. The unit includes a large program room, which is utilized for indoor exercise, classrooms, programs, and meetings. The cells are double-bunked and there are shower areas at one end, upstairs and downstairs, with a curtain to provide privacy for the inmates.</p> <p>The auditor interviewed five youthful inmates during the inmate interviews. Each of the five inmates confirmed that there was always separation from adult inmates. They said that no adult inmates enter the youthful housing area. The auditor interviewed a deputy assigned to the youthful housing area, who confirmed that adult inmates were not allowed to enter the youthful housing area at any time. He also confirmed separation of the youthful inmates by sight and sound. He told the auditor the facility does not utilize solitary confinement to achieve this separation, as the youthful inmates are assigned to this separate area. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.14(b).</b> The auditor reviewed <i>CO 310.16 Inmate Movement</i>, which was provided in the PAQ. This policy states, "When juvenile inmates are moved outside of their assigned housing unit, halls and common areas will be cleared of adult inmates in order to prevent sight or sound interaction between juvenile and adult inmates."</p> <p>During the onsite audit, the auditor interviewed a deputy assigned to the youthful housing area. He confirmed that adult inmates were not allowed to enter the youthful housing area at any time. He also confirmed separation of the youthful inmates from adult inmates by sight and sound at all times throughout the facility. The deputy explained that hallways are cleared of adult inmates before youthful inmates are escorted through the halls if they are being escorted to medical or outside the facility. The auditor interviewed five youthful inmates during the onsite phase of the audit. All five inmates stated that they are kept separate from adult inmates at all times. When asked about movement through the facility hallways, they stated that adult inmates are cleared from the halls before they come outside the unit. All three told the auditor that the youthful inmates are always under the direct escort of a deputy. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.14(c).</b> The auditor reviewed <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>, which was provided in the PAQ. This policy states, "Juveniles will also be afforded large muscle exercise, education services, and programs attendance."</p> <p>During the onsite audit, the auditor interviewed a deputy assigned to the youthful housing area. The deputy confirmed that the agency does not utilize solitary confinement to achieve the separation from adult inmates, as the youthful inmates are assigned to their own separate housing area. He also stated that any reduction in programs and exercise are documented in the disciplinary and housing logs. The auditor also interviewed an instructor from the school board, who provides daily education for the youthful inmates. He confirmed that education for the youthful inmates is provided in the programs room,</p>	

which is separate from the rest of the facility and is done without contact with adult inmates. He stated that all inmates attend educational classes unless they have documented disciplinary reports.

The auditor interviewed five youthful inmates during the onsite phase of the audit. All five inmates stated they can attend all classes and have access to the outside recreation yard every day, unless they are serving disciplinary time. All five inmates stated that none of them have been placed in isolation. They said that all the cells in their unit have two bunks and they don't need isolation in order to stay away from adult inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.



115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 913" style="list-style-type: none"> <li>Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>CO 330.01 Intake</li> <li>CO 440.04 Gender Identification Care and Custody</li> <li>Training curriculum</li> <li>Training records</li> <li>Housing Unit Logs</li> </ol> </li> <li>Interviews: <ol style="list-style-type: none"> <li>Specialized staff</li> <li>Targeted inmates</li> <li>Random inmates</li> </ol> </li> <li>Site Review Observations: <ol style="list-style-type: none"> <li>Control rooms (electronic monitoring)</li> <li>Strip search room</li> <li>Bathrooms and shower areas</li> <li>Housing units</li> <li>Medical services</li> </ol> </li> </ol> <p data-bbox="240 943 501 969"><b>Findings (by provision):</b></p> <p data-bbox="240 999 1434 1093"><b>115.15(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “Cross-gender searches (pat-downs or strip searches) are not permitted unless exigent circumstances exist (p. 2).” The PAQ shows that no body cavity searches were performed in the previous 12 months.</p> <p data-bbox="240 1122 1489 1350">During the site review, the auditor viewed the strip search area in the facility’s booking area. This area is separated from viewing from other inmates and staff members and there are no cameras in the area that could view the inmate in a state of undress during the search. This area is utilized for unclothed searches of inmates upon transfer into or out of the facility. During the onsite audit, the auditor interviewed two officers that were responsible for cross-gender searches. Both officers confirmed that searches of inmates are always performed by deputies of the same gender. They also stated that body cavity searches must first be approved by administration and then only performed by medical staff at the hospital. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1379 1485 1509"><b>115.15(b).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “Cross-gender searches (pat-downs or strip searches) are not permitted unless exigent circumstances exist (p. 2).” The PAQ shows that no pat down searches of female inmates were performed by male staff members in the previous 12 months. The PAQ also shows there were no inmates who had out of cell opportunities restricted to comply with this provision.</p> <p data-bbox="240 1538 1489 1834">During the site review, the auditor experienced the intake process in booking and saw where searches of inmates would be performed and was told the search of a female inmate would always be performed by a female deputy, based on the agency policy. The auditor had informal discussion with inmates during the site review and was told that pat searches of female inmates are always performed by female deputies. The auditor interviewed 16 random staff members during the onsite phase of the audit. All 16 deputies stated that pat down searches of female inmates are always performed by female deputies. The auditor was told that male deputies can search female inmates in exigent circumstances, but no one could recall an instance when that was necessary. The auditor interviewed 16 random inmates during the onsite audit, six of which were female inmates. Each inmate confirmed that pat searches were always performed by female deputies. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1863 1469 2058"><b>115.15(c).</b> The agency provided <i>CO 330.01 Intake</i> in the PAQ. The policy states, “A strip search of an inmate during intake procedures shall be accomplished only upon the written authorization of the supervising officer on duty.” The facility also provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “Cross-gender searches (pat-downs or strip searches) are not permitted unless exigent circumstances exist (p. 2).” In the PAQ, the agency indicated that there were zero cross-gender searches conducted over the previous 12 months prior to the audit. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 2087 1453 2150"><b>115.15(d).</b> The agency provided <i>CO 440.04 Gender Identification Care and Custody</i> in the PAQ. This policy states, “To enable all inmates to shower, perform bodily functions, and change clothing without nonmedical staff of opposite gender</p>

viewing their breasts, buttocks or genitalia, except in exigent circumstances or when such viewing is incidental or routine cell checks, staff shall employ an "announce" practice when a staff member of the opposite gender enters a housing unit." Documentation of this opposite gender announcement is placed in the housing unit logs, which was viewed by the auditor.

During the site review, the auditor visited all housing units and viewed the restroom and shower areas. In all areas, the auditor could see the specific actions taken to provide privacy for the inmates and to prevent cross-gender viewing of inmates' breasts, genitalia, and buttocks. The toilets in all units are inside the cells and there is ample privacy for the inmates while they use the toilet. The showers are in separate stalls at the end of the housing unit, and each is equipped with a shower curtain for privacy. The auditor checked the video monitors in the control rooms in each housing unit. In each control room, the auditor was able to view the monitor and verified that no showers or toilets were visible on the monitors.

Also, during the site review, the auditor routinely witnessed cross-gender announcements during entry into every housing unit. Each time we attempted to enter a dormitory, a deputy clearly made a loud announcement of "female or male on the floor". We were then asked to wait a moment before we entered, allowing inmates the opportunity to cover up if it was necessary.

During random interviews with 16 inmates, they all stated that officers routinely make an announcement before entry to the unit. All 16 of the inmates interviewed confirmed they felt comfortable to shower and use the restroom without staff members of the opposite sex viewing them. During random interviews with 16 officers, they confirmed that cross-gender announcements are done every time a deputy of the opposite gender enters a housing unit. Deputies stated clearly that they cannot see inmates in the showers and restrooms and will only see inmates naked during routine cell checks and security rounds. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.15(e).** In the PAQ, the agency provided *CO 440.04 Gender Identification Care and Custody*. On page 5, the policy states, "Strip and security searches shall not be conducted for the sole purpose of observing the transgender or intersex inmate's genitalia or determining gender. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing the medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. At no time shall non-medical staff conduct a strip search in order to determine and inmate's gender." The agency noted no such searches in the PAQ during the 12 months prior to the onsite audit.

During the onsite phase of the audit, the auditor was unable to interview any transgender inmates, as there were no such inmates in custody at the time of the audit. The auditor interviewed 16 random deputies and was told that such searches of transgender inmates was a violation of policy. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.15(f).** In the PAQ, the agency provided *CO 440.04 Gender Identification Care and Custody*. On page 5, the policy states, "Strip searches shall be conducted in a professional and respectful manner, and in the least invasive manner possible, consistent with security needs and according to policy." The facility provided the auditor a copy of the search procedures training curriculum that is provided for staff on an annual basis. The training identifies the need for staff members to perform pat searches using the bladed technique between and under the breasts to search for contraband. The training also requires the need to do searches in a professional and respectful manner, in the least intrusive manner possible. The auditor was provided training records for the current year, which documents staff member completion of the search procedures training.

During the onsite phase of the audit, the auditor interviewed 16 random deputies. Each of the 16 deputies confirmed completion of the search procedures training during the new hire training or the annual refresher training. The required training for cross-gender searches was included in the training. All 16 deputies stated that the training included how to perform the searches of transgender inmates in a professional and respectful manner. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 745" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Corrections Division Inmate Handbook - English</li> <li>3. Corrections Division Inmate Handbook - Spanish</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> <li>2. Targeted inmates</li> <li>3. Random inmates</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Postings in housing units</li> <li>2. Medical housing</li> <li>3. Inmate educational materials</li> </ol> </li> </ol> <p data-bbox="240 775 501 801"><b>Findings (by provision):</b></p> <p data-bbox="240 831 1493 1025"><b>115.16(a).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. In the <i>Detainee Education</i> section, the policy states, “As part of the detainee’s orientation, information is provided to all detainees via the intake video and the detainee handbook, available via the issued inmate tablet or housing visitation kiosk, regarding the facility’s detainee sexual abuse/assault prevention and intervention program. The Department of Justice PREA education video shall be broadcast twice a week at 1745 hours in all cellblocks /pods with televisions. This video will be shown in both English and Spanish, versions as accommodate detainees with limited English; who are hearing impaired; and who are vision impaired.”</p> <p data-bbox="240 1055 1493 1417">During the onsite phase of the audit, the auditor interviewed one inmate with a physical disability, one inmate who is partially blind, and three inmates with a cognitive disability. Each of these five inmates were able to explain the zero-tolerance information and how to file an allegation of sexual abuse or sexual harassment. All the inmates stated they had no problems understanding or receiving the PREA education in orientation. One inmate with a cognitive disability was having a problem understanding at first, but after talking with the auditor, he began to recall the sexual abuse information and easily explained how to ask for help if he was in danger or abused. The partially blind inmate explained that he could see and hear the video information. During the site review, the auditor viewed the PREA signage, and it appeared to be posted at a level that was easily viewed by all inmates, even those that were wheelchair-bound. Grievances are available to all inmates and the agency orders require accommodations for those that need assistance to file a grievance. The telephones are also in a place easily accessible for all inmates, so all inmates would be able to call the PREA hotline. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1447 1493 1709"><b>115.16(b).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. In the <i>Detainee Education</i> section, the policy states, “As part of the detainee’s orientation, information is provided to all detainees via the intake video and the detainee handbook, available via the issued inmate tablet or housing visitation kiosk, regarding the facility’s detainee sexual abuse/assault prevention and intervention program. The Department of Justice PREA education video shall be broadcast twice a week at 1745 hours in all cellblocks /pods with televisions. This video will be shown in both English and Spanish, versions as accommodate detainees with limited English; who are hearing impaired; and who are vision impaired.” The auditor was provided a copy of the <i>Corrections Division Inmate Handbook</i> in the PAQ, which is printed in English and Spanish. The auditor noted education for inmates regarding the zero-tolerance policy.</p> <p data-bbox="240 1738 1493 2033">The auditor spoke with two inmates who spoke Spanish during the random inmate interviews. One of the two inmates required the assistance of a staff member who translated for the inmate and the auditor. Both inmates confirmed receiving the PREA education by watching the PREA video in Spanish. They explained to the auditor how to file an allegation of sexual abuse if it were necessary. They also understood behavior that was improper. The inmates all have a copy of the <i>Corrections Division Inmate Handbook</i> in Spanish. The auditor viewed PREA signage in the housing units during the site review and all signs were available in both English and Spanish. The auditor was also shown the agency’s Guardian RFID units, which are hand-held units available throughout the facility. These units have installed a translator app which can be utilized at any time to assist with translating for inmates that have limited English proficiency. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 2063 1493 2159"><b>115.16(c).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “In instances where language is a barrier staff will utilize either bilingual staff, google translator installed on all Spartan log units or the language line telephone system. Inmate translators will not be used unless mitigating circumstances exist and safety is</p>

a concern.”

During the onsite phase of the audit, the auditor spoke with 16 random deputies and 16 random inmates. All staff and inmates stated that the facility does not utilize inmates to interpret for other inmates. Staff members stated clearly that using an inmate to interpret could be dangerous, as there is no way to ensure that the translation from their language to English is accurate. Staff stated that there are many staff members available who could translate, or they could utilize their hand-held Guardian unit, which has a translator application included. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 1323 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>HR 110.02 Background Investigations on Current Members</i></li> <li>3. <i>Sarasota County Sheriff's Office Prison Rape Elimination Act of 2003 Acknowledgement Form</i></li> <li>4. Employment records</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1490 1126"><b>115.17(a).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The agency shall not 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— (1) 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); (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 this paragraph." The auditor was also provided <i>HR 110.02 Background Investigations on Current Members</i> in the PAQ. This human resources policy states, "In conjunction with human resources bureau policy # HR 410.01, Hiring Standards, the following are reasons for disqualification of the employment/contract for anyone who may have contact with detainees: a. If he/she has engaged in sexual abuse in a prison, jail, lockup, community confinement, juvenile facility or other institution (as defined in 42 U.S.C. 1997); b. If he/she has been convicted of engaging, or attempting to engage in, sexual activity in the community that is facilitated by force, overt or implied threats of force or coercion, or if the victim did not consent or was unable to consent; c. If he/she has been civilly or administratively adjudicated to have engaged in the activity described in paragraph, (1 b) of this section."</p> <p data-bbox="240 1160 1490 1350">The auditor was provided a copy of the <i>Sarasota County Sheriff's Office Prison Rape Elimination Act of 2003 Acknowledgement Form</i>. This form is utilized for new hires and promotions and includes the three questions in this provision that must be answered by all applicants before they can be considered for employment or promotion. The auditor reviewed the records of ten randomly selected staff members. The agency provided a completed employment application for each staff member, which included the three questions in the standard. Each staff member had marked "no" to each question. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1384 1490 1641"><b>115.17(b).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The agency shall consider 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." The auditor was also provided <i>HR 110.02 Background Investigations on Current Members</i> in the PAQ. This human resources policy states, "In conjunction with General Order 12.4, Anti-Harassment Policy, the sheriff's office shall consider any incidents of sexual harassment when determining whether to hire or promote a person, or to enlist the services of any contractor who may have contact with detainees." The auditor was provided a copy of the <i>Sarasota County Sheriff's Office Prison Rape Elimination Act of 2003 Acknowledgement Form</i>. This form is utilized for new hires and promotions and includes a question regarding sexual harassment.</p> <p data-bbox="240 1675 1490 1798">During the onsite phase of the audit, the auditor interviewed a staff member from human resources. The auditor was told that all applicants are asked specific questions about sexual harassment. The applicant is required to affirmatively state that he or she has not been the subject of a sexual harassment investigation. This is also confirmed through the background check of prior employers. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1832 1490 2089"><b>115.17(c).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Before hiring new employees who may have contact with inmates, the agency shall: (1) Perform a criminal background records check; and (2) 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." The auditor was also provided <i>HR 110.02 Background Investigations on Current Members</i> in the PAQ. This policy states, "A criminal background check will be conducted using best efforts to contact all prior institutional employers for information on substantiated allegations of sexual misconduct, or any resignation pending an investigation of sexual misconduct." The agency listed 23 staff members hired over the last 12 months that passed the background checks.</p> <p data-bbox="240 2123 1490 2150">The auditor reviewed the records of ten randomly selected staff members. The agency provided clear records showing the</p>

appropriate background checks performed with no indication of prior sexual offenses listed for each of the ten records reviewed.

During the onsite phase of the audit, the auditor interviewed a staff member from human resources. The auditor was told that all applicants must pass the full criminal history review before being considered for employment. Also, a full check of prior employers is completed for everyone before the applicant's file can receive final approval. These same reviews are completed for contractors before they are authorized to be approved to perform duties inside the secure perimeter of the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.17(d).** In the PAQ, the auditor was provided *HR 110.02 Background Investigations on Current Members* in the PAQ. This policy states, "In conjunction with human resources bureau policy # HR 110.01, Background Investigations, the following criteria will be applied to applicants/prospective contractors who may have contact with detainees: a. A criminal background check will be conducted using best efforts to contact all prior institutional employers for information on substantiated allegations of sexual misconduct, or any resignation pending an investigation of sexual misconduct."

During the onsite phase of the audit, the auditor interviewed a staff member from human resources. The auditor was told that all individuals, including contractors must pass the full criminal history review before being approved for entrance to the facility. The reviews are completed for contractors before they are authorized to be approved to perform duties inside the secure perimeter of the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.17(e).** In the PAQ, the auditor was provided *HR 110.02 Background Investigations on Current Members* in the PAQ. This policy states, "In conjunction with FCIC/NCIC/CJIS requirements, a system is in place for the automatic notification of arrest using the automatic response system in FCIC/NCIC. All information for current employees and volunteers shall immediately be forwarded to the human resources bureau. This process is automated due to the electronic submission of fingerprints." As part of the agency's background investigation process, all applicants, and existing staff members as well as those contractors and volunteers with unescorted access to the jail compound, inmates, or Criminal History Record Information will submit to a fingerprint-based background check as required by the Florida Department of Law Enforcement. The fingerprints will be collected under the agency's unique nine-character ORI number and retained in the FALCON system. Employees and contractors who complete a level 2 background check will be retained in the FALCON system.

During the onsite phase of the audit, the auditor interviewed a human resources staff member. She confirmed that fingerprinting of staff is a part of their normal procedure. FALCON is an integrated state-of-the-art system for identifying criminals and reporting data. For law enforcement agencies and correctional agencies, it is utilized through a livescan program, where employee fingerprints are scanned into the FALCON system. Once entered in the enrolled agency file, the FDLE will automatically identify and alert at any time if that individual's fingerprints are received through a new arrest anywhere in the United States. The alert is sent from the FDLE to the agency's contact, thus providing an automatic system to capture employee arrests. Use of this FALCON system satisfies the requirement for the five-year background check. The agency's policy of fingerprinting all staff members, volunteers, and contractors, satisfies the standards requirements for the five-year background checks. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.17(f).** In the PAQ, the auditor was provided *HR 110.02 Background Investigations on Current Members* in the PAQ. This policy states, "Applicants/prospective contractors will be asked directly about their involvement in sexual misconduct, as outlined in paragraph 4 of this section."

During the auditor's interview with the human resources staff member, it was confirmed the agency follows this provision of the standard. She explained that questions regarding an individual's prior employment, sexual abuse and sexual harassment allegations, and prior criminal offenses are asked during the oral interview process. She also confirmed that all employees are required to report any arrests or allegations of sexual harassment. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.17(g).** In the PAQ, the auditor was provided *HR 110.02 Background Investigations on Current Members* in the PAQ. This policy states, "Material omission regarding sexual misconduct, or the provision of materially false information, are grounds for termination."

During the interview with the human resources staff member, the auditor confirmed that the agency will terminate any employee for false information provided during the application process or omissions of fact of any information, including sexual abuse and sexual harassment. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.17(h).** During the onsite phase of the audit, the auditor interviewed a staff member from human resources. She confirmed that the agency would, in fact, provide potential new employers with information regarding a past employee's sexual abuse and sexual harassment allegations and/or investigations. She stated that they would not want an individual who had already participated in such activities to have access to inmates in another facility. She stated that there is no law prohibiting this in Florida. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> <li>1. None</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.18(a).</b> The agency did not provide any documentation relative to this standard.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. He stated that the administration constantly reviews what changes might be needed for the Sarasota County Correctional Facility. Although none are needed at this time, they would always consider the sexual safety of the inmate population when making decisions. Modifications must consider proper line of sight, ensuring that new construction does not create blind spots, and ensuring new construction will not inhibit an inmate's ability to benefit from all aspects of PREA. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.18(b).</b> The agency did not provide any documentation relative to this standard.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who stated that the administration constantly reviews what video updates might be needed for the Sarasota County Correctional Facility. He went on to say that the video system was updated from analog to digital and total cameras increased from 349 to 430 since the last PREA audit. Each digital camera is capable of 7-10 digital views. He also told the auditor that any updates to the facility's video monitoring technology to better monitor public areas of the facility and housing units will be intended to enhance the overall sexual safety of the inmate population. This provides additional safety for staff and inmates and increases the agency's ability to respond promptly to situations such as assaults or sexual victimization. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 1485 712" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Sarasota Memorial Hospital Department Policy 112.241 Sexual Assault Victim: Management of</i></li> <li>3. <i>INV 110.03 Collection and Preservation of Physical Evidence</i></li> <li>4. <i>Memorandum of Understanding between the Sarasota County Sheriff's Office and Safe Place and Rape Crisis Center</i></li> <li>5. <i>INV 210.11 Victim Assistance Unit</i></li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Medical services</li> </ol> </li> </ol> <p data-bbox="240 741 501 768"><b>Findings (by provision):</b></p> <p data-bbox="240 797 1490 1025"><b>115.21(a).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If a detainee alleges sexual assault, a sensitive and coordinated response is necessary and a criminal investigation will ensue. If a detainee alleges sexual harassment by staff or volunteers an administrative investigation shall be initiated by the division commander." The auditor was also provided <i>INV 110.03 Collection and Preservation of Physical Evidence</i>. This policy states, "All evidence shall be properly collected, labeled, marked, and sealed in accordance with agency General Orders 23.3, Crime and Fire Scene Responsibilities and 23.9, Evidence, Property and Impounded Vehicles, as well as FDLE evidence handling protocols."</p> <p data-bbox="240 1055 1490 1283">During the onsite phase of the audit, the auditor interviewed an investigator from the Sheriff's Office. He confirmed that they investigate all allegations of sexual abuse made by inmates at the jail. The investigator stated they utilize a standard evidence collection format provided by the FDLE that follows the national protocol. During random staff interviews, the auditor interviewed 16 deputies. Each of the 16 deputies interviewed knew that the Sheriff's Office investigates all allegations of sexual abuse and sexual assault. All 16 deputies also knew that evidence was collected by the investigator and deputies were responsible to protect the crime scene to preserve the evidence until it could be collected. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1312 1490 1608"><b>115.21(b).</b> The auditor was provided <i>Sarasota Memorial Hospital Department Policy 112.241 Sexual Assault Victim: Management of</i>, in the PAQ. This document establishes criteria for the treatment of adult and pediatric victims of sexual assault. Through interviews with staff, the auditor learned that inmate victims of sexual assault that require a forensic sexual assault examination would be transported to Sarasota Memorial Hospital (SMH) for the examination. The SMH policy, in the <i>Purpose of the Forensic Team</i> section, states, "To provide the victim with professional nursing support during the collection of medical and non-medical evidence. To assure the evidence is collected and handled in a consistent manner adhering to Florida Department of Law Enforcement (FDLE) standards and that chain of custody is maintained." The policy references the Department of Justice's (DOJ) Office on Violence Against Women publication, "<i>A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents</i>", for the hospital protocol.</p> <p data-bbox="240 1637 1458 1767">The auditor reviewed the evidence protocol and compared it with the Department of Justice's (DOJ) Office on Violence Against Women publication, "<i>A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents</i>." The FDLE protocol appears to be based upon the DOJ protocol. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1796 1490 1993"><b>115.21(c).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Medical staff shall assist in coordinating the transport of the victim to Sarasota Memorial Hospital for physical examination and any forensic evidence gathering." The policy also states, "Any detainee who alleges he/she has been sexually assaulted shall be offered immediate protection from the assailant and shall be referred for a medical and mental health examination and a clinical assessment of the potential for suicide or other related symptomatology at no cost." In the PAQ, the agency stated there was one such forensic examination for an inmate victim over the previous 12 months prior to the audit.</p> <p data-bbox="240 2022 1466 2152">During the onsite phase of the audit, the auditor conducted an interview with the emergency room director from SMH. She confirmed that inmate victims of sexual assault at the facility would be transported to SMH for the forensic medical examination. She stated that a SANE is either on duty in the emergency room or available on call or elsewhere in the hospital. When asked, the director stated they will respond to all calls for response, so there is no need for an alternative</p>



plan for coverage for a SANE. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.21(d).** In the PAQ, the facility provided a *Memorandum of Understanding (MOU) between the Sarasota County Sheriff's Office and Safe Place and Rape Crisis Center*. The MOU calls for Safe Place and Rape Crisis Center (SPARCC) to provide victim advocacy services for the Sarasota County Correctional Facility. This advocacy includes the advocacy accompaniment during sexual assault forensic exams and investigatory interviews. The auditor was also provided *INV 210.11 Victim Assistance Unit* in the PAQ, whose purpose is to establish guidelines for an effective victim and witness advocate unit to provide a comprehensive level of advocacy services to the community. This policy states, "Victim advocates shall work closely with SPARCC in assisting the victim in any way possible."

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He stated that the facility has access to victim advocates through the local domestic violence rape crisis center. Inmates are informed of the available advocates through the inmate handbook. During the onsite audit, the auditor conducted a telephone interview with the director at the rape crisis center, who confirmed that their agency provides a victim advocate for victims at the Sarasota County Correctional Facility pursuant to an agreement with the Sarasota County Sheriff's Office. The auditor also interviewed two inmates who had reported sexual abuse. Both inmates told the auditor they knew that victim advocates were available to them. They both declined to speak to an advocate. The staff at the facility told them about the advocate and the investigator told them about the advocate. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.21(e).** In the PAQ, the facility provided a *Memorandum of Understanding (MOU) between the Sarasota County Sheriff's Office and Safe Place and Rape Crisis Center*. The MOU calls for Safe Place and Rape Crisis Center (SPARCC) to provide victim advocacy services for the Sarasota County Correctional Facility. This advocacy includes the advocacy accompaniment during sexual assault forensic exams and investigatory interviews.

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He stated that the facility has access to victim advocates through the local domestic violence rape crisis center. Inmates are informed of the available advocates through the inmate handbook. During the onsite audit, the auditor conducted a telephone interview with the director at the rape crisis center, who confirmed that their agency provides a victim advocate for victims at the Sarasota County Correctional Facility pursuant to an agreement with the Sarasota County Sheriff's Office. The auditor also interviewed two inmates who had reported sexual abuse. Both inmates told the auditor they knew that victim advocates were available to them. They both declined to speak to an advocate. The staff at the facility told them about the advocate and the investigator told them about the advocate. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.21(f).** Since sexual abuse investigations are performed by the agency, this provision does not apply to the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.21(g).** The auditor is not required to review this provision.

**115.21(h).** The Sarasota County Correctional Facility has a contract with SPARCC to provide victim advocacy services for the facility. With this contract in place, it is not necessary to utilize staff members to provide victim advocate services. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.22(a).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If a detainee alleges sexual assault, a sensitive and coordinated response is necessary and a criminal investigation will ensue. If a detainee alleges sexual harassment by staff or volunteers an administrative investigation shall be initiated by the division commander." In the PAQ, the agency stated there were a total of 23 allegations of sexual abuse and sexual harassment received, 19 allegations resulting in an administrative investigation, and four allegations referred for criminal investigation.</p> <p>During the onsite phase of the audit, the auditor reviewed the agency's incident reports and grievances from the previous 12 months. The auditor could not find any reports or grievances related to sexual abuse or sexual harassment that were not investigated properly. The auditor also reviewed the agency's sexual abuse and sexual harassment investigations from the previous 12 months. There were 23 allegations that were investigated properly. The auditor interviewed the Major, the Bureau Commander, who confirmed that all allegations of sexual abuse and sexual harassment are investigated by the Sheriff's Office. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.22(b).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If a detainee alleges sexual assault, a sensitive and coordinated response is necessary and a criminal investigation will ensue. If a detainee alleges sexual harassment by staff or volunteers an administrative investigation shall be initiated by the division commander." The policy also states, "Criminal Investigations Section (CIS) will be notified and conduct the investigation."</p> <p>During the onsite phase of the audit, the auditor interviewed an investigator from the Sheriff's Office. The investigator confirmed that agency policy requires that all allegations of sexual abuse and sexual harassment are referred to him for investigation. There are two detectives available at the Sheriff's Office to investigate sexual abuse allegations. The auditor reviewed the Sarasota County Sheriff's Office website, and under the tab for Prison Rape Elimination Act, the agency lists the agency's zero-tolerance information and provides the public an opportunity to file an allegation of sexual abuse or sexual harassment on a third-party grievance form. The agency's PREA policy is also posted. The information can be found here: <b>Welcome to Sarasota County Sheriff's, FL (<a href="http://sarasotasheriff.org">sarasotasheriff.org</a>)</b>. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.22(c).</b> All investigations are performed internally for the Sarasota County Correctional Facility so there is no need to note additional information on the website. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.22(d).</b> The auditor is not required to audit this provision.</p> <p><b>115.22(e).</b> The auditor is not required to audit this provision.</p>

115.31	<b>Employee training</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 975 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Field Training Academy curriculum – Sexual Abuse/Battery</i></li> <li>3. <i>COR8012 Corrections Annual PREA Refresher</i></li> <li>4. Training logs</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Random staff</li> </ol> </li> </ol> <p data-bbox="240 609 501 636"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1477 994"><b>115.31(a).</b> In the PAQ, the facility provided a copy of their <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. This policy states, "All staff shall be trained on policies to include PREA education and this agency's zero-tolerance policy regarding sexual abuse and/or sexual harassment and how to report these incidents: a. Recognize the physical, behavioral, and emotional signs of detainee sexual assault; b. Understand the identification and referral process when an alleged detainee sexual assault occurs; and c. Have a basic understanding of sexual assault prevention and response techniques." The auditor was provided the agency's training curriculum, <i>Field Training Academy curriculum – Sexual Abuse/Battery</i>, in the PAQ. The auditor reviewed the curriculum and verified the appearance of the ten required points of the standard. The training material is presented in a manner that all staff members can understand, and the agency utilizes a test at the end of the course to measure understanding. The education is presented in the classroom and is supplemented by computer-based training.</p> <p data-bbox="240 1025 1485 1249">During the onsite phase of the audit, the auditor interviewed 16 random staff members and spoke informally with several staff members. Each person interviewed indicated that they received PREA education prior to beginning work in the secure facility or had received it when the first PREA education was provided by the agency. All deputies interviewed verified the ten points of this standard in the agency training. The auditor was told that they get PREA training as part of their annual training. The auditor reviewed training records for ten randomly selected deputies and verified attendance in the training and written proof of completion of the PREA course. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1281 1465 1375"><b>115.31(b).</b> The Sarasota County Correctional Facility houses both male and female inmates. Therefore, all staff members receive the same training and there is no need for additional gender-specific training. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1406 1469 1536"><b>115.31(c).</b> In the PAQ, the facility provided <i>COR8012 Corrections Annual PREA Refresher</i>. The course includes the ten required training points for PREA. Staff members are required to complete the course annually through the agency's online learning center. The course includes a quiz at the end to ensure understanding of the information. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1568 1477 1697"><b>115.31(d).</b> All classroom training and online classes require staff to acknowledge, in writing or electronically, they understand and will comply with the training on PREA. The PREA course includes a test to confirm the staff member's understanding of the information provided. The auditor was provided several copies of proof of completion of PREA training in the PAQ.</p> <p data-bbox="240 1729 1469 1823">The auditor reviewed random training records during the onsite phase of the audit. The records show acknowledgement of completion of the PREA training on an annual basis. Records show full completion of the training by staff. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Civilian Staff Volunteers &amp; Independent Contractors Orientation</i></li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.32(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “All volunteers and contracted staff who will have contact with detainees will complete an orientation/overview of facility policies to include PREA education and this agency’s zero-tolerance policy regarding sexual abuse and/or sexual harassment and how to report these incidents.” The auditor was also provided the <i>Civilian Staff Volunteers &amp; Independent Contractors Orientation</i> in the PAQ. The agency indicated that 81 approved volunteers and contractors have been educated on the PREA policies.</p> <p>During the onsite phase of the audit, the auditor interviewed three contractors who have inmate contact in the facility. All three confirmed completion of the required PREA education provided by the agency. The agency requires annual training with the agency’s curriculum. The auditor was not able to interview volunteers due to the ongoing national pandemic. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.32(b).</b> In the PAQ, the facility provided <i>Civilian Staff Volunteers &amp; Independent Contractors Orientation</i>. The curriculum satisfied the requirements under this provision of the standard. The agency stated that all volunteers, contractors, and civilian staff are trained on the same information, regardless of the level of contact with inmates.</p> <p>During the onsite phase of the audit, the auditor interviewed three contractors who have inmate contact in the facility. All three confirmed completion of the required PREA education provided by the agency and could easily state the zero-tolerance policy and knew how to report allegations of sexual abuse in the facility. The auditor was not able to interview volunteers due to the ongoing national pandemic. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.32(c).</b> The auditor was provided copies of volunteer and contractor written acknowledgement of training in the PAQ. They showed written proof that the volunteer and/or contractor had completed the required orientation material, which included the PREA education. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 680" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Corrections Division Inmate Handbook</i></li> <li>3. <i>Zero-Tolerance Poster</i></li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Random staff</li> <li>3. Random inmates</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Housing units</li> </ol> </li> </ol> <p data-bbox="240 707 501 734"><b>Findings (by provision):</b></p> <p data-bbox="240 763 1493 992"><b>115.33(a).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “As part of the detainee’s orientation, information is provided to all detainees via the intake video and the detainee handbook, available via the issued inmate tablet or housing visitation kiosk, regarding the facility’s detainee sexual abuse/assault prevention and intervention program.” The agency supplied the facility’s zero-tolerance poster in the PAQ. The poster includes the inmates’ right to report sexual abuse and sexual harassment and how to report such incidents. In the PAQ, the agency stated that of the 8,296 inmates who were admitted to the facility during the past 12 months, 100% of them had received the intake education.</p> <p data-bbox="240 1021 1493 1350">During the onsite phase of the audit, the auditor toured the facility booking floor and walked through the process for intake of an inmate. The auditor acted as an inmate and was presented an intake form, which provides inmates with PREA education and other information. Inmates are required to sign the form acknowledging receipt of the education on the form. The auditor also viewed the zero-tolerance poster in several places in the booking area as well as the intake PREA video on the television on the booking floor. It was explained that inmates are required to watch the intake video prior to moving to intake housing. The auditor interviewed 16 random inmates during the onsite audit. They all described receiving education about PREA when they arrived at the facility. All 16 inmates could easily describe the zero-tolerance policy, knew what behavior was prohibited, and knew how to report sexual abuse. The auditor interviewed two intake staff members and they confirmed providing the intake handout to all inmates while they did the intake process. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1379 1493 1608"><b>115.33(b).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “The Department of Justice PREA education video shall be broadcast twice a week at 1745 hours in all cellblocks /pods with televisions. This video will be shown in both English and Spanish, versions as accommodate detainees with limited English; who are hearing impaired; and who are vision impaired. Wing supervisors are to ensure that the video is played at the appropriate time.” The comprehensive education is provided to all inmates by video in all housing units. The agency provided documentation to show 6,431 inmates with a length of stay of 30 days or more over the last 12 months prior to the audit and all 6,431 inmates had received the comprehensive education.</p> <p data-bbox="240 1637 1493 1800">During the onsite phase of the audit, the auditor interviewed several deputies throughout the facility, and they confirmed the delivery of the comprehensive PREA education several times a week. The auditor saw the video playing in several housing units during the site review. The auditor interviewed 16 random inmates during the onsite phase of the audit. All 16 inmates confirmed receiving the PREA education and could answer all the questions. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1830 1493 1957"><b>115.33(c).</b> The facility provides all inmates with education regarding PREA at intake and during orientation. The auditor interviewed intake staff during the onsite audit and walked through the intake process. The orientation process and PREA education is provided for all inmates within seven days of intake. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1986 1493 2150"><b>115.33(d).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, “Information is also included in the detainee handbook on services and programs (e.g., counseling, sex offender treatment) for sexually assaultive or aggressive detainees. Fliers will be posted in conspicuous locations in open booking and courthouse holding cells explaining how to utilize the third-party hotline to report sexual misconduct. Handbooks may be requested in a specific language. The Department of Justice PREA education video shall be broadcast twice a week at 1745</p>

hours in all cellblocks /pods with televisions. This video will be shown in both English and Spanish, versions as accommodate detainees with limited English; who are hearing impaired; and who are vision impaired”

During the onsite phase of the audit, the auditor could see posters in each of the housing units and in several other locations that were provided in English and Spanish. The posters inform inmates of their right to be free from sexual abuse and sexual harassment, free from retaliation for reporting abuse and that the agency would properly respond to incidents of such abuse. Also, the *Corrections Division Inmate Handbook* is available to inmates in both languages. The auditor reviewed documentation under standard 115.16 to verify the various methods available to provide inmate education. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.33(e).** In the PAQ, the facility provided copies of signed acknowledgment of receipt of PREA education forms. The auditor reviewed several documents and confirmed the inmates' receipt of the education. This information is also maintained in the corrections management system. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.33(f).** During the site review, the auditor could see many forms of PREA education readily available for inmates. In all housing units there are signs posted in English and Spanish. These signs remind inmates that sexual abuse is not tolerated and provides the hotline number, as well as the information for available counseling services. The inmates are also provided a *Corrections Division Inmate Handbook*, where the agency's sexual abuse policy is documented. The information is also available constantly on the inmate kiosk in the housing units. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.34	<b>Specialized training: Investigations</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="277 349 906 544" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Training curriculum</li> <li>3. Training certificates</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p data-bbox="242 573 501 602"><b>Findings (by provision):</b></p> <p data-bbox="242 631 1474 725"><b>115.34(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Detectives who investigate incidents of sexual abuse will have specialized training concerning sexual abuse investigations in a confinement setting."</p> <p data-bbox="242 757 1485 916">The auditor interviewed a detective from the Sheriff's Office during the onsite phase of the audit. The detective confirmed that he had taken the investigations specialized course and had successfully received his certificate. The detective was able to recite the four points from this provision and told the auditor it was included in the training. The auditor reviewed training records and verified completion of the online course provided by the agency. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 947 1481 1041"><b>115.34(b).</b> In the PAQ, the facility provided the training curriculum from the National Institute of Corrections and the Florida Sheriff's Association. The curriculum is known to the auditor and meets the requirements of the standard, covering each of the four points listed in the provision.</p> <p data-bbox="242 1072 1485 1232">The auditor interviewed a detective from the Sheriff's Office during the onsite phase of the audit. The detective confirmed that he had taken the investigations specialized course and had successfully received his certificate. The detective was able to recite the four points from this provision and told the auditor it was included in the training. The auditor reviewed training records and verified completion of the online course provided by the agency. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1263 1469 1357"><b>115.34(c).</b> The Department maintains documentation showing completion of the investigations course for 36 individuals, including the PREA coordinator, facility supervisors, and two Sheriff's Office detectives. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1388 855 1417"><b>115.34(d).</b> The auditor is not required to audit this provision.</p>

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>NaphCare J/P-F-06 Response to Sexual Assault</i></li> <li>3. <i>Civilian Staff Volunteers &amp; Independent Contractors Orientation</i></li> <li>4. Training records</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.35(a).</b> In the PAQ, the facility provided <i>NaphCare J/P-F-06 Response to Sexual Assault</i>. This Health Care Procedure directs contracted health care staff on the proper response to incidents of sexual abuse in the corrections facility. The procedure states, "All health care staff members will be trained in sexual abuse prevention, detection, assessment, and evidence preservation; how to respond effectively; and on reporting procedures for suspicions of sexual abuse." The agency indicated that 39 medical and mental health staff members are approved for work at the facility, and they all have completed the specialized PREA education.</p> <p>During the onsite phase of the audit, the auditor interviewed three staff members from the contracted medical department. All three confirmed having taken the online specialized medical course and completed the class. They acknowledged understanding the four points of the standard that were included in the training. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.35(b).</b> Forensic exams for inmate victims at the Sarasota County Correctional Facility are conducted at the Sarasota Memorial Hospital. Therefore, medical and mental health staff members are not provided additional education in this subject. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.35(c).</b> The Department maintains written documentation of each staff member's completion of the specialized medical course and provided proof to the auditor for review. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.35(d).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "All volunteers and contracted staff who will have contact with detainees will complete an orientation/overview of facility policies to include PREA education and this agency's zero-tolerance policy regarding sexual abuse and/or sexual harassment and how to report these incidents." The contracted medical and mental health care staff are required to meet the expectations laid out by the agency in order to be in compliance with this standard. All contracted medical staff members must complete the basic orientation and annual education. The auditor was provided proof of medical staff completion of the basic orientation class. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>



115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 678" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 330.04 Classification</li> <li>2. PREA Profile Checklist</li> <li>3. Inmate records</li> <li>4. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Random inmates</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Classification</li> </ol> </li> </ol> <p data-bbox="240 707 501 734"><b>Findings (by provision):</b></p> <p data-bbox="240 763 1461 826"><b>115.41(a).</b> The agency supplied <i>CO 330.04 Classification</i> in the PAQ. The policy states, "All inmates will be assessed for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates."</p> <p data-bbox="240 855 1489 1151">During the onsite phase of the audit, the auditor interviewed a classification staff member and the classification manager who confirmed that all inmates are screened upon admission to the Sarasota County Correctional Facility. The auditor observed as the classification staff member performed the initial risk screening for two inmates. The classification staff member explained the screening process and the reason why the screening was being performed. The risk screening contained the proper questions related to the standard. The auditor asked the classification staff member several questions to confirm that the process is routine and was satisfied based on the responses and how the screening was performed, that the intake screening is a normal and routine part of the intake process for inmates. The auditor interviewed 16 random inmates during the onsite audit. All 16 of the inmates confirmed that they had been asked the screening questions when they had arrived at the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1180 1461 1308"><b>115.41(b).</b> The agency supplied <i>CO 330.04 Classification</i> in the PAQ. The policy states, "All inmates shall be initially classified within 72 hours following admission." The agency noted in the PAQ that 6,140 inmates entered the Sarasota County Correctional Facility within the last 12 months and all 6,140 inmates were assessed within 72 hours of entering the facility.</p> <p data-bbox="240 1337 1474 1565">During the onsite phase of the audit, the auditor reviewed 10 inmate records which all included the risk screening. The screening had been completed within the first two days of the inmate's arrival at the facility. During interviews with a classification staff member who performs the risk screening, it was confirmed that the screening of all inmates is done by classification personnel within the first two days of the inmate's arrival at the facility. The auditor interviewed 16 random inmates during the onsite audit. All 16 of the inmates confirmed that they had been asked the screening questions. The 16 inmates related that the screening was completed within the required 72-hour time frame. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1594 1493 1758"><b>115.41(c).</b> The auditor was provided a copy of the agency's <i>PREA Profile Checklist</i>, their PREA risk assessment screening tool. The auditor reviewed the screening tool to determine if it was objective. The screening tool requires a simple yes or no answer to each of the questions and the scoring system is standard for everyone screened. Because the screening tool does not allow for subjective answers, the tool is objective. The outcome for potential to be victimized or become a predator is based on a standard scoring system. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1787 1489 1915"><b>115.41(d).</b> The auditor was provided a copy of the agency's <i>PREA Profile Checklist</i>, their PREA risk assessment screening tool. The screening tool lists each of the criteria listed in this provision of the standard. Additionally, the screening tool provides space for the screener to add comments based on the observations of the screener regarding the inmate's potential for vulnerability. The tool asks the inmate for his or her feeling of safety while incarcerated.</p> <p data-bbox="240 1944 1461 2107">During the onsite phase of the audit, the auditor interviewed a classification staff member who performs the risk screening. She explained that classification personnel speak directly with the inmate to complete the screening tool and ask all the questions on the tool. They are encouraged to include comments regarding their observations regarding safety and vulnerability based on the conversation with the inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

**115.41(e).** The auditor was provided a copy of the agency's *PREA Profile Checklist*, their PREA risk assessment screening tool. The Sarasota County screening tool provided to the auditor includes questions about the inmate's prior sexual abuse history in a detention facility, prior sexual abuse while incarcerated in Sarasota County, and committed sexual abuse at any time in the inmate's life. The screening asks the assessor to review known history of the inmate to determine if there is documentation of committed sexual abuse other than the inmate's admitted offenses. The screening also reviews additional violent criminal offenses.

The auditor interviewed a classification staff member who performs the risk screening during the onsite phase of the audit. She confirmed that the screening tool includes questions about an inmate's prior acts of sexual abuse, prior convictions for violent offenses and history of prior institutional violence or sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.41(f).** The agency supplied *CO 330.04 Classification* in the PAQ. The policy states, "Classification is a continuous process that requires reviewing the inmate's custody status and updating all classification records as required by the individual's custody level. The guidelines previously stated for initial classification shall also be utilized during reclassification. In addition, a reclassification shall require a review of the custody level, special conditions and classification records which may require an interview with the inmate." The agency noted in the PAQ that 5,602 inmates entered the Sarasota County Correctional Facility within the last 12 months whose length of stay was for 30 days or more and all 5,602 inmates were assessed within 30 days of entering the facility.

During the onsite phase of the audit, the auditor interviewed a classification staff member who performs the risk screening who confirmed that inmates are reassessed within 30 days from the initial booking date. The auditor reviewed records for 10 inmates and confirmed the reassessment was completed within 30 days of the inmate's arrival at the facility. During interviews with 16 random inmates, the auditor asked if they were asked additional follow-up questions by classification staff and all 16 recalled this reassessment. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.41(g).** The agency supplied *CO 330.04 Classification* in the PAQ. The policy states, "Classification is a continuous process that requires reviewing the inmate's custody status and updating all classification records as required by the individual's custody level. The guidelines previously stated for initial classification shall also be utilized during reclassification. In addition, a reclassification shall require a review of the custody level, special conditions and classification records which may require an interview with the inmate."

The auditor interviewed a classification staff member who performs the risk screening during the onsite audit, and she confirmed that inmates are continually reassessed based on information that is received from other staff, inmates or through incident reports. During interviews with 16 random inmates, all 16 of the inmates stated they recalled being asked follow-up questions by classification or medical staff. The auditor reviewed the agency's sexual abuse investigation files from the 12 months prior to the audit and was able to confirm that following the allegation of sexual abuse, the victim was reassessed following the incident. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.41(h).** The agency supplied *CO 330.04 Classification* in the PAQ. The policy states, "Refusal to answer questions concerning risk of sexual victimization shall not result in discipline"

During the onsite audit, the auditor interviewed a classification staff member who performs the risk screening. She all stated that inmates will not be disciplined if they refuse to answer questions or decide not to disclose information during the risk screening. Agency policy does not allow that, and it is the inmate's decision to not disclose the information. The auditor was told that staff attempt to encourage the inmate to answer the questions by reminding the inmate that the information is used to keep them safe. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.41(i).** The agency supplied *CO 330.04 Classification* in the PAQ. The policy states, "Responses to sexual abuse assessment questions will be used and maintained by classification personnel solely for the purpose of proper housing classification." The auditor learned the information is maintained in the classification system and accessible only by classification personnel and the PREA Coordinator.

During the onsite phase of the audit, the auditor interviewed a classification staff member who performs the risk screening. She all told the auditor that only classification personnel and the PREA Coordinator can access the risk screening information in the computer. Without a logon, you cannot access the information. The PREA coordinator was interviewed, and he stated that screening information is accessible by medical staff and classification staff. The PREA Coordinator has specific access to perform his job duties. During the site review, the auditor asked several random deputies to access the screening and they were unable to access it. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 580" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.04 Gender Identification Care and Custody</li> <li>2. CO 330.04 Classification</li> <li>3. Inmate records</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> </ol> <p data-bbox="240 607 501 636"><b>Findings (by provision):</b></p> <p data-bbox="240 665 1485 826"><b>115.42(a).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "Inmates shall be assigned housing units, work assignments, education and other programming according to the following classification criteria to include level of offense, medical or mental condition (if any), adjudication status, gender and other considerations that may apply." The agency provided copies of risk screening results for several inmates in the PAQ. The auditor was able to see the factors from the risk screening utilized to keep separate inmates that score as vulnerable from those that score as potential abusers.</p> <p data-bbox="240 855 1485 1151">During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who was asked how the agency utilizes the information from the risk screening. He stated that the scoring for risk of victimization and risk of being abusive is entered into the classification system and that provides coding for victimization or abusiveness to ensure separation when placing inmates into housing units or work placements or programs. This ensures the required separation for safety. The auditor also interviewed a classification staff member. She confirmed the use of the screening information to properly house those inmates at risk of victimization separate from those with a potential be abusive. These housing decisions are made on an individual basis and are based on the risk screening scoring system. This separation affects not only where the inmate is housed, but also the jobs and programs that are assigned to the inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1180 1469 1442"><b>115.42(b).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "Classification personnel shall utilize NorthPointe which is an objective jail classification system for inmate housing and programs. This a nationally recognized classification system that relies on a narrow set of well-defined legal factors and personal characteristics of an inmate, including severity of current offense, current offense status (sentenced vs. non-sentenced), prior felony convictions, prior assaultive felony convictions, escape history, age and institutional behavior (both prior and current) as well as pending charges or holds in other jurisdictions to develop individualized determinations to ensure safety and security." The agency provided copies of risk screening results for several inmates in the PAQ. The auditor was able to see the factors from the risk screening utilized to keep separate inmates that score as vulnerable from those that score as potential abusers.</p> <p data-bbox="240 1471 1485 1632">During the onsite phase of the audit, the auditor interviewed a classification staff member. She confirmed the use of the screening information to properly house those inmates at risk of victimization separate from those with a potential be abusive. These housing decisions are made on an individual basis and are based on the risk screening scoring system. This separation affects not only where the inmate is housed, but also the jobs and programs that are assigned to the inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1662 1485 1892"><b>115.42(c).</b> In the PAQ, the facility provided <i>CO 440.04 Gender Identification Care and Custody</i>. The policy states, "Transgender or intersex inmates may be housed according to their gender identity, rather than their birth sex. In deciding whether to assign a transgender or intersex inmate to housing for male or female inmates, as well as other programming assignments, classification and the operations bureau commander or his/her designee shall consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and if the placement would present management or security problems. If deemed necessary for the inmate's safety and emotional well-being, classification may place transgender or intersex inmates according to their birth sex, taking into account the facility's safety and security."</p> <p data-bbox="240 1921 1485 2083">During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who confirmed that transgender and intersex inmates are reviewed on a case-by-case basis, which is consistent with the policy. The review is completed during a case review meeting prior to the inmate's placement in housing. The auditor was unable to interview any transgender inmates during the onsite audit as there were no transgender inmates in custody at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 2112 1469 2141"><b>115.42(d).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "Transgender inmates shall not be</p>

discriminated against in their participation of programs or services. Placement and programming assignments of transgender inmates shall be reassessed at least twice each year to review any threats to safety experienced by the inmate."

The auditor interviewed a classification staff member during the onsite phase of the audit. She confirmed that transgender inmates are reassessed twice per year to verify that the transgender inmate is not in any danger and is housed safely, works in a safe situation, and attends safe programming. The reassessment is performed by classification personnel. The auditor also interviewed the PREA coordinator, who confirmed that this reassessment for transgender inmates occurs every six months and is documented as part of the coordinator's victim file. The PREA coordinator provided the auditor with copies of the review for two transgender inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.42(e).** In the PAQ, the facility provided *CO 440.04 Gender Identification Care and Custody*. The policy states, "LGBTI inmates may make requests to have their housing re-evaluated using the grievance system. A transgender or intersex inmate's own views with respect to his or her own safety shall be seriously considered."

During the onsite phase of the audit, the auditor was unable to interview any transgender inmates during the onsite audit as there were no transgender inmates in custody at the time of the onsite audit. The auditor interviewed a classification staff member who stated that transgender inmates are asked about their housing preferences during the screening process. The auditor also interviewed the PREA coordinator, who also stated that transgender inmates are provided the opportunity to share their preferences for housing. Their view for their safety is a part of the housing decisions along with the screening scores, the needs of the Department, and the safety of the rest of the inmate population. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.42(f).** In the PAQ, the facility provided *CO 440.04 Gender Identification Care and Custody*. The policy states, "Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates."

During the onsite phase of the audit, the auditor was unable to interview any transgender inmates during the onsite audit as there were no transgender inmates in custody at the time of the onsite audit. The auditor interviewed a classification staff member who is responsible for the risk screening. She stated that transgender inmates are given the opportunity to shower separately from other inmates in the housing unit. The auditor also interviewed the PREA coordinator during the onsite audit. The PREA coordinator stated that this opportunity for separate showering is noted in the policy. Officers in the housing units are instructed to provide times for transgender inmates to shower after lockdown when other inmates cannot watch the transgender inmate in the shower. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.42(g).** In the PAQ, the facility provided *CO 330.04 Classification*. The policy states, "Classification shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing is established in connection with a consent decree, legal settlement, or legal judgement for the purpose of protecting such inmates." The auditor reviewed the provided list of housing units for the facility and was able to determine that none of the units was labeled specifically for inmates that identified as gay, lesbian, bisexual, or transgender.

The auditor interviewed one inmate that identifies as gay, lesbian, or bisexual during the onsite audit. The auditor was unable to interview any transgender inmates during the onsite audit as there were no transgender inmates in custody at the time of the onsite audit. The inmate told the auditor he is housed in general population in a regular housing unit, and he was not confined in a special housing unit for gay or transgender inmates. The auditor interviewed the PREA coordinator who told the auditor that the facility is not under any consent decree or court order that requires them or allows them to house gay and transgender inmates in a specific unit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43	<b>Protective Custody</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 330.04 Classification</li> <li>2. CO 440.04 Gender Identification Care and Custody</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> <li>3. Site Review Observations: <ol style="list-style-type: none"> <li>1. Segregated housing units</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.43(a).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "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. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for no more than 24 hours while completing the assessment." In the PAQ, the agency states that there have been four inmates placed in involuntary segregation over the previous 12 months to separate them from likely abusers.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, and he stated that involuntary segregation is only used to protect those inmates that are at risk for victimization, but only as a last resort when there is no other safe housing available. If segregation is utilized, it would be used for the least amount of time necessary, until an alternative housing is made available. He was not aware of the last time the facility has had to resort to that measure in order to protect an inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.43(b).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "Special management inmates and keep separate inmates shall be afforded, in keeping with maintaining security and order, privileges and program access comparable to those in general population." The auditor was also provided <i>CO 440.04 Gender Identification Care and Custody</i> in the PAQ. The policy states, "Transgender, intersex, or other inmates who are placed in administrative segregation or other special management housing for their safety and security shall not have their privileges, programs, education and work opportunities restricted, without documentation listing limited opportunities, duration of the limitations, and non-discriminatory reasons for limitations."</p> <p>The auditor talked to two inmates that were in the administrative and disciplinary unit and both inmates had full access to the telephone, medical and mental health care, inmate requests, grievance forms, and programs. The auditor confirmed this information by speaking with deputies that worked in the unit. Even though inmates were held in confinement, they still had access to all of this, as much as possible. This confirmed that if the agency saw the need to confine an inmate due to the high risk for victimization, they could still provide the inmate with access to programs and privileges, consistent with this provision. The auditor interviewed a deputy assigned to segregated housing and he confirmed the access to programming and privileges in confinement. There were no inmates who were housed in confinement due to the high risk for victimization that could be interviewed by the auditor relative to this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.43(c).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days." In the PAQ, the agency states that there have been zero inmates placed in involuntary segregation more than 30 days over the previous 12 months to separate them from likely abusers.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who stated that the facility had not placed any inmates in involuntary segregation over the last 12 months. The auditor interviewed a deputy that works in confinement, and he stated that no inmates have been housed in confinement due to the high risk of victimization for more than 30 days. There were no inmates who were housed in confinement due to the high risk for victimization that could be interviewed by the auditor relative to this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.43(d).</b> In the PAQ, the facility provided <i>CO 330.04 Classification</i>. The policy states, "If an involuntary segregated</p>	

housing assignment is made pursuant to this paragraph, the facility shall clearly document the basis for the facility's concern for the inmate's safety; and why no alternative means of separation can be arranged."

The auditor reviewed the records of two inmates that were found to be at high risk for sexual victimization during the onsite audit. Those records contained clear documentation of the basis for the confinement. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.43(e).** In the PAQ, the facility provided *CO 330.04 Classification*. The policy states, "A review will be conducted every 30 days to determine whether there is a continuing need for separation from the general population."

During the onsite phase of the audit, the auditor interviewed a deputy that works in confinement, and he stated that four inmates have been housed in confinement due to the high risk of victimization. Although, there are no inmates currently in segregation for this reason, all inmates in segregation are reviewed every two weeks to confirm their stay in segregation and any limitations to their rights and privileges. There were no inmates who were housed in confinement due to the high risk for victimization that could be interviewed by the auditor relative to this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 1010 712" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol data-bbox="339 383 1010 510" style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Corrections Division Inmate Handbook</i></li> <li>3. <i>Zero-Tolerance signs</i></li> <li>4. <i>Alternative Answers Message Centre Ltd. Account agreement</i></li> </ol> </li> <li>2. Interviews: <ol data-bbox="339 551 568 645" style="list-style-type: none"> <li>1. Random staff</li> <li>2. PREA coordinator</li> <li>3. Random inmates</li> </ol> </li> <li>3. Site Review Observations: <ol data-bbox="339 685 523 712" style="list-style-type: none"> <li>1. Housing units</li> </ol> </li> </ol> <p data-bbox="240 741 501 768"><b>Findings (by provision):</b></p> <p data-bbox="240 797 1489 1093"><b>115.51(a).</b> In the PAQ, the auditor was provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. This policy states, "As part of the detainee's orientation, information is provided to all detainees via the intake video and the detainee handbook, available via the issued inmate tablet or housing visitation kiosk, regarding the facility's detainee sexual abuse/assault prevention and intervention program, including; d. Methods of reporting incidents of sexual abuse/assault (e.g. telephone hotline, incident reporting on the kiosks and tablets, written communication, and notifying staff)." The auditor was provided a copy of the <i>Corrections Division Inmate Handbook</i>, which is provided to all inmates in booking. The Handbook, on page 10, lists the numerous ways that an inmate can report an allegation of sexual abuse and sexual harassment. The auditor was also provided a slide from the inmate orientation video and the <i>Zero-Tolerance</i> sign, where the agency lists the various reporting methods.</p> <p data-bbox="240 1126 1481 1350">During the onsite phase of the audit, the auditor completed a site review and visited all housing units. Signs informing inmates of the multiple reporting ways were clearly posted, in two languages, in each housing unit. The signs all include the ways listed in the policy. The auditor interviewed 16 random inmates and all inmates could easily tell the auditor several ways that they could report abuse, harassment and concerns regarding staff neglect or lack of responsibility. Most of the 16 inmates mentioned the PREA hotline as their first avenue to report abuse. That option is clearly marked by telephones throughout the facility. The auditor interviewed 16 random staff members. All staff could list at least four different ways that inmates could report abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1384 1485 1574"><b>115.51(b).</b> The agency provided the agency's <i>Zero-Tolerance</i> facility sign in the PAQ. The signs are posted in both English and Spanish. All the facility signs include the agency's external hotline number, which is answered by staff at the <i>Alternative Answers Message Centre Ltd.</i> The auditor was provided the <i>Alternative Answers Message Centre Ltd. account agreement</i> in the PAQ. The agreement provides information on the account and outlines how the line is answered and how information is transmitted back to the facility. The auditor tested the hotline through several calls while performing the site review and all calls were properly reported back to the PREA coordinator.</p> <p data-bbox="240 1608 1481 1697">The auditor was also provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "Inmates detained solely for civil immigration purpose may view information on how to contact relevant consulates and Department of Homeland Security on the posted consular information at intake or in the tablet documentation section."</p> <p data-bbox="240 1731 1485 1955">During the onsite phase of the audit, the auditor saw the signs posted throughout the facility and in all the housing units. Information regarding the hotline is also available on the inmate kiosk and in the <i>Corrections Division Inmate Handbook</i>. The auditor interviewed the PREA coordinator and asked about the outside reporting entity. He explained that the agency's hotline number is answered by the <i>Alternative Answers Message Centre</i>. The information is posted on all the signs and is in the handbook provided to all inmates at intake. The auditor interviewed 16 random inmates and all 16 knew how to report allegations of sexual abuse through the hotline. They knew that the information was posted on the signs in the housing unit. Based on this analysis, the auditor finds the facility in compliance with this standard.</p> <p data-bbox="240 1989 1473 2145"><b>115.51(c).</b> <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> was provided to the auditor in the PAQ. This policy states, "Methods of reporting incidents of sexual abuse/assault (e.g. telephone hotline, incident reporting on the kiosks and tablets, written communication, and notifying staff). English and Spanish PREA flyers are posted in all lobby, booking and, housing areas describing sexual assault right to report, how to report, and available victim support services. Staff sensitivity toward detainees who are victims of sexual abuse/assault is critical. Staff shall take seriously all statements from a detainee who</p>

says he/she has been a victim of sexual assault and respond supportively and non-judgmentally. Staff will report immediately any knowledge, suspicion, or information concerning sexual misconduct regardless of if misconduct occurred while the detainee was not in the custody of the sheriff's office."

During the onsite phase of the audit, the auditor interviewed 16 random staff members. All staff interviewed were aware of their responsibility to take verbal reports of abuse and immediately contact a supervisor to file that report. There was one deputy that reported having received a verbal allegation from an inmate. Each of the 16 random inmates interviewed were aware that they could report sexual abuse directly to any staff member, call the hotline, write a grievance, or have someone else file a report for them. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.51(d).** In the PAQ, the auditor was provided with *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "Staff may privately report sexual misconduct to the PREA hotline: 1-888-951-2410."

The auditor interviewed 16 random staff members. All 16 explained to the auditor that they could talk to any supervisor or to the PREA hotline to privately report incidents of sexual abuse and sexual harassment. Based on this analysis, the auditor finds the facility in compliance with this provision.



115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

**The following evidence was analyzed in making the compliance determination:**

1. Documents: *(Policies, directives, forms, files, records, etc.)*
  1. *CO 440.03 Prison Rape Elimination Act (PREA)*
  2. *CO 440.04 Inmate Rights*
  3. *Corrections Division Inmate Handbook*
2. Interviews:
  1. Targeted inmates

**Findings (by provision):**

**115.52(a).** The Sarasota County Correctional Facility is not exempt from this standard, as it does have in place an administrative grievance procedure for inmates. *CO 440.04 Inmate Rights*, provided to the auditor in the PAQ, states, "Inmates shall have access to a grievance procedure through which problems may be expressed and resolved." Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(b).** The agency provided *CO 440.04 Inmate Rights* in the PAQ for the auditor to review. This policy states, "Grievances may be submitted via the tablet or kiosk located within the housing unit. When technical issues prevent submission via the tablet or kiosk, submissions shall be made in writing on an Inmate Grievance form. Grievance forms must be received no later than 15 business days from the date on which the incident or action being grieved occurred. The exception to this shall be in the case of sexual misconduct; no time limit shall apply." The auditor was provided a copy of the *Corrections Division Inmate Handbook*. In the Handbook, inmates are provided the agency's grievance procedures on pages 10 and 11, that include the provisions required under the PREA standards. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(c).** The agency provided *CO 440.04 Inmate Rights* in the PAQ for the auditor to review. The policy states, "An inmate who alleges sexual misconduct of staff may submit a grievance without submitting it to the staff member who is the subject of the complaint; and such grievance will not be referred to the staff member who is the subject of the complaint." Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(d).** The agency provided *CO 440.04 Inmate Rights* in the PAQ for the auditor to review. The policy states, "The reviewing authority shall have twenty (20) days from the date of receipt of the grievance to take action and respond. This time frame excludes holidays and weekends. The bureau commander, or his/her designee, shall respond to the inmate in writing, indicating the result of the appeal and reasons supporting the decision within five (5) business days of documentation receipt. Supervision may claim an extension of an additional 70 days if the original 20 days is insufficient to make an appropriate decision. The supervisor shall notify the inmate in writing of any such extension and provide a date by which a decision will be made." In the PAQ, the agency states there have been 24 sexual abuse grievances filed in the 12 months prior to the audit and 23 of those were provided a response within the 90-day time period. The last grievance was after the time period due to a filing of criminal charges on the case.

During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse. Both inmates were aware of their option to file a grievance regarding sexual abuse. Neither of the inmates had done so, so they could not provide additional information relative to this provision of the standard. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(e).** The agency provided *CO 440.04 Inmate Rights* in the PAQ for the auditor to review. The policy states, "In the matter of sexual misconduct third party reporting systems are in place for inmates. Third parties may report sexual misconduct via the online reporting system on the sheriff's office website or through the toll-free hotline. Any refusal for assistance by an inmate shall be documented." Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(f).** The agency provided *CO 440.04 Inmate Rights* in the PAQ for the auditor to review. The policy states, "The shift supervisor who receives the inmate grievance, or other supervisory deputy appointed by the shift supervisor, shall make an inquiry into the grievance within 48 hours, excluding weekends and holidays. The exception to this shall be in the case of sexual misconduct; inquiry into sexual misconduct shall occur immediately upon receipt of such grievance to determine whether the inmate is at risk for imminent harm. Inmates will have the ability to submit grievances of staff abuse directly to the bureau commanders or watch commanders." The agency indicated that all grievances submitted relative to sexual abuse of an inmate are treated as emergency grievances and there were 24 submitted over the last 12 months. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.52(g).** In the PAQ, the facility provided *CO 440.04 Inmate Rights*. The policy states, "Grievances found to be submitted with malicious intent may result in discipline." Based on this analysis, the auditor finds the facility in compliance with this provision.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**The following evidence was analyzed in making the compliance determination:**

1. Documents: (*Policies, directives, forms, files, records, etc.*)
  1. *CO 440.03 Prison Rape Elimination Act (PREA)*
  2. *Corrections Division Inmate Handbook*
  3. *SPARCC Sexual Assault Services Pamphlet*
  4. *Memorandum of Understanding between Sarasota County Sheriff's Office and Safe Place and Rape Crisis Center*
2. Interviews:
  1. Specialized staff
  2. Random inmates
  3. Targeted inmates
3. Site Review Observations:
  1. Housing units

**Findings (by provision):**

**115.53(a).** The facility provided information from *CO 440.03 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "The facility shall provide victims of sexual abuse with access to outside victim advocates for emotion support and will maintain a memoranda of understanding (MOU) or other agreements with community service providers. Addresses and hotlines for national, state and local advocacy and crisis organizations shall be provided. Addition information shall be provided civil immigration purposes. Reasonable effort shall be made to allow for confidential communication s between the victim and support resources. The extent of the confidentiality will be explained to the victim prior to granting access to outside support. The inmate will be informed of mandatory reporting rules concerning privacy, confidentiality, and disclosure of sexual abuse made to outside support including limits required by federal, state, or local laws." The auditor was also provided the *Corrections Division Inmate Handbook* in the PAQ. The auditor located the emotional support services information on page11 of the document. The auditor was also provided a *SPARCC Sexual Assault Pamphlet* in the PAQ. The pamphlet provides information about the local rape crisis center. The auditor was told that this information is also uploaded to the inmate tablets for available reading material. The agency does house inmates solely for civil immigration purposes and information for those inmates is included.

During the onsite phase of the audit, the auditor interviewed 20 random inmates. Sixteen of the 20 inmates interviewed could explain to the auditor the available support and advocacy services. They knew that these services were available if someone were a victim of sexual abuse, but also knew they could contact someone outside because they had read it in the Handbook. Some did not know the phone number or address but knew it was in the Handbook and available on the signs in the housing unit. None of the inmates had used the services. The other four inmates were not aware of those services. The auditor interviewed four inmates who had reported sexual abuse and all four inmates were aware of the available support services, although none of the four took advantage of the services. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.53(b).** The facility provided information from *CO 440.03 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "The facility shall provide victims of sexual abuse with access to outside victim advocates for emotion support and will maintain a memoranda of understanding (MOU) or other agreements with community service providers. Addresses and hotlines for national, state and local advocacy and crisis organizations shall be provided. Addition information shall be provided civil immigration purposes. Reasonable effort shall be made to allow for confidential communication s between the victim and support resources. The extent of the confidentiality will be explained to the victim prior to granting access to outside support. The inmate will be informed of mandatory reporting rules concerning privacy, confidentiality, and disclosure of sexual abuse made to outside support including limits required by federal, state, or local laws."

During the onsite phase of the audit, the auditor interviewed 16 random inmates. Fourteen of the 16 inmates interviewed could explain to the auditor the available support and advocacy services. They knew that these services were available if someone were a victim of sexual abuse, but also knew they could contact someone outside because they had read it in the Handbook. Some did not know the phone number or address but knew it was in the Handbook and available on the signs in the housing unit. None of the inmates had used the services. The other two inmates were not aware of those services. They were not aware of the level of confidentiality. The auditor interviewed two inmates who had reported sexual abuse and both inmates were aware of the available support services, although neither took advantage of the services. Both inmates had been advised of the confidentiality limits of the support services. Based on this analysis, the auditor finds the facility in

compliance with this provision.

**115.53(c).** In the PAQ, the agency provided the auditor a copy of the *Memorandum of Understanding between Sarasota County Sheriff's Office and Safe Place and Rape Crisis Center*. The Memorandum of Understanding provides for the Safe Place and Rape Crisis Center (SPARCC) to provide victim advocate services to those inmates at the Sarasota County Correctional Facility that may require such services. These services may be through contact over the telephone, through mailed communication, or in person at the corrections facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.54	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 1026 412" style="list-style-type: none"> <li data-bbox="276 349 906 376">1. Documents: (Policies, directives, forms, files, records, etc.) <ol data-bbox="339 383 1026 412" style="list-style-type: none"> <li data-bbox="339 383 1026 412">1. Sarasota County Sheriff's Office Website PREA Reporting Form</li> </ol> </li> </ol> <p data-bbox="240 443 501 470"><b>Findings (by provision):</b></p> <p data-bbox="240 499 1490 757"><b>115.54(a).</b> In the PAQ, the auditor was directed to the Sarasota County Sheriff's Office website, <b>Welcome to Sarasota County Sheriff's, FL (sarasotasheriff.org)</b>. On the website, there is a link to a page specific for the agency's PREA information. On this page the agency provides a link for a third-party reporting form. The auditor reviewed the form and the web page and confirmed that it meets the requirements of this provision. The auditor utilized the form to file a test complaint and was notified by the PREA coordinator the next morning that the complaint had been received and was submitted for investigation. The web page can be found at <b>Welcome to Sarasota County Sheriff's, FL (sarasotasheriff.org)</b>. Inmates are informed through signage and the inmate handbook that the public can file allegations on the third-party grievance form. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.61	<b>Staff and agency reporting duties</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

**The following evidence was analyzed in making the compliance determination:**

1. Documents: (*Policies, directives, forms, files, records, etc.*)
  1. *CO 440.03 Prison Rape Elimination Act (PREA)*
2. Interviews:
  1. Specialized staff
  2. Random staff

**Findings (by provision):**

**115.61(a).** In the PAQ, the facility provided *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "Staff sensitivity toward detainees who are victims of sexual abuse/assault is critical. Staff shall take seriously all statements from a detainee who says he/she has been a victim of sexual assault and respond supportively and non-judgmentally. Staff will report immediately any knowledge, suspicion, or information concerning sexual misconduct regardless of if misconduct occurred while the detainee was not in the custody of the sheriff's office. The sheriff's office will not tolerate any form of retaliation against those who report suspected sexual misconduct or participate in the investigation of such misconduct."

During the onsite phase of the audit, the auditor interviewed 16 random staff members. Every person interviewed clearly stated that they were required to immediately report all allegations of sexual assault or sexual harassment. During the site review, the auditor spoke with staff members throughout the facility. Each staff member knew that it was a requirement for all staff to immediately report all knowledge or suspicion of sexual abuse of an inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.61(b).** *CO 440.03 Prison Rape Elimination Act (PREA)*, provided to the auditor in the PAQ, states, "Information concerning the identity of a detainee victim reporting a sexual assault, 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 detainee-victim's welfare and for law enforcement/investigative purposes."

During the onsite phase of the audit, the auditor interviewed 16 random staff members. All 16 deputies were aware of the agency policy that required immediate reporting of sexual abuse and sexual harassment allegations. Each of the deputies understood the requirement to maintain privacy and not share the information with others unless necessary. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.61(c).** The State of Florida requires mandatory reporting of incidents of sexual abuse of an inmate under Florida State Statute 944.35(3)(d). This law does not provide an exception for medical and mental health practitioners and all staff members of the Sarasota County Correctional Facility are required to immediately report all incidents.

During the onsite phase of the audit, the auditor interviewed three staff members from the medical department. All three confirmed that they are mandatory reporters of sexual abuse of inmates. Staff did confirm that they would inform the inmate of their duty to report and the limits to the confidentiality of information learned from the inmate. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.61(d).** *CO 440.03 Prison Rape Elimination Act (PREA)*, provided to the auditor in the PAQ, includes the statement, "Any incident involving a juvenile victim will be reported to the Department of Children and Family." In the State of Florida, staff are required to report allegations of sexual abuse of a person under the age of 18 to the Florida Department of Children and Families (DCF).

The auditor interviewed the Major, the Bureau Commander, during the onsite phase of the audit. He stated that immediate action would be taken to ensure the inmate's safety and DCF and outside law enforcement would be notified along with the required internal agencies. Medical and mental health would be notified, the Sarasota County Sheriff's Office would be notified, and the agency's Jail Investigator would be notified. The auditor also interviewed the PREA coordinator who stated that for individuals under the age of 18, the agency would contact outside law enforcement and report the incident to DCF per Florida Statute. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.61(e).** *CO 440.03 Prison Rape Elimination Act (PREA)* states, "The Sheriff's Office shall provide access to services to victims via third party and shall conduct investigations of detainee sexual abuse/assault incidents to include third party and anonymous reporting."

The auditor interviewed the Major, the Bureau Commander, during the onsite phase of the audit. He was clear that every allegation of sexual abuse and sexual harassment is investigated at the institution. They take every allegation very seriously. When they receive the allegation, they follow a process that includes an immediate reporting to a Sheriff's Office detective. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Random staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.62(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Staff will report immediately any knowledge, suspicion, or information concerning sexual misconduct regardless of if misconduct occurred while the detainee was not in the custody of the sheriff's office." In the PAQ, the agency included information that there were no inmates found to be in substantial risk of imminent sexual abuse during the 12 months prior to the audit.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. The Major told the auditor that they would take immediate action to separate the inmate from the potential abuser as soon as staff was notified. Staff would take a full report of the inmate's concern and then take action to rehouse the inmate in a safer situation. The auditor interviewed 16 random staff members during the onsite audit. All 16 deputies stated that they would take immediate action to remove the inmate from the situation, including rehousing the inmate to another housing unit or potentially placing the inmate in protective custody if the situation warranted such action. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>



115.63	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. INV 210.12 Prison Rape Elimination Act (PREA)</li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. Agency head</li> <li>2. Specialized staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.63(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The directive states, "If inmate transferred to the correctional facility reports an allegation of sexual abuse at another facility an incident report will be written and forwarded to the PREA compliance manager. Within 72 hours the PREA compliance manager will notify the head or appropriate office of the facility where such abuse took place. The PREA compliance manager will maintain a record of such notification." In the PAQ, the agency noted no such notifications during the 12 months prior to the audit. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.63(b).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The directive states, "If inmate transferred to the correctional facility reports an allegation of sexual abuse at another facility an incident report will be written and forwarded to the PREA compliance manager. Within 72 hours the PREA compliance manager will notify the head or appropriate office of the facility where such abuse took place. The PREA compliance manager will maintain a record of such notification." In the PAQ, the agency noted no such notifications during the 12 months prior to the audit. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.63(c).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The directive states, "If inmate transferred to the correctional facility reports an allegation of sexual abuse at another facility an incident report will be written and forwarded to the PREA compliance manager. Within 72 hours the PREA compliance manager will notify the head or appropriate office of the facility where such abuse took place. The PREA compliance manager will maintain a record of such notification." In the PAQ, the agency noted no such notifications during the 12 months prior to the audit. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.63(d).</b> In the PAQ, the facility provided <i>INV 210.12 Prison Rape Elimination Act (PREA)</i>. The policy states, "An investigation shall be completed, regardless of whether the detainee is currently in custody or not, and whether or not the suspect is incarcerated or employed by this agency." The auditor was notified in the PAQ that there was one such notification during the 12 months prior to the audit. The allegation was fully investigated, and the allegation was unfounded.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. The Major confirmed that any notification from another agency would be investigated to the extent possible. He was aware of one such incident occurring over the previous 12 months, which was investigated fully by the agency. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. Targeted inmates</li> <li>2. Specialized staff</li> <li>3. Random staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.64(a).</b> The facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. In the section entitled <i>Investigation and Prosecution</i>, the agency outlines the responsibilities for staff members to properly to respond to allegations of sexual abuse. The policy states, "Upon learning of an allegation of sexual abuse the first responding staff member shall separate the alleged victim and abuser. The crime scene shall be preserved, and information/evidence collected consistent with evidence gathering/processing procedures. The victim shall not be allowed to shower, wash, drink, eat, change clothing or use the bathroom as it may destroy important evidence." In the PAQ, the agency stated there were 24 reported incidents of sexual abuse reported over the previous 12 months, where the security staff member took action to separate the alleged victim from the alleged abuser. Of those 24, there was 1 incident where the time period allowed for the preservation of physical evidence.</p> <p>The auditor interviewed two staff members who were first responders to incidents of sexual abuse during the onsite phase of the audit. Both staff members identified the proper steps to take as a first responder. Both told the auditor that their allegation was reported after the time frame to properly collect evidence. The auditor interviewed two inmates who reported sexual abuse during the onsite audit. Both inmates reported that they were immediately separated from all other inmates and held until evidence could be collected. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.64(b).</b> The facility stated in the PAQ that security staff members will always be present if an inmate reports an allegation of sexual abuse. The agency stated there were no such incidents of sexual abuse reported over the previous 12 months, where the first responder was not a security staff member.</p> <p>During the onsite phase of the audit, the auditor interviewed one non-security staff member who would be a first responder to an incident of sexual abuse. He told the auditor that a non-security staff member would immediately notify a deputy upon learning of the incident. The auditor interviewed 16 random staff members during the onsite audit. All 16 staff members understood the proper steps to take upon identifying an incident of sexual abuse. When asked, they told the auditor a non-security staff member would ensure the victim was safe then immediately notify a corrections officer, probably a supervisor. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.65(a).</b> The agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy includes sections entitled Prompt and Effective Intervention and Investigation and Prosecution. These sections clearly outline the duties of a first responder, facility supervisors, medical and mental health staff, investigators, administration, and the PREA coordinator.</p> <p>The duties include the steps to take as a first responder, as required in Standard 115.64, and immediate notification to a supervisor. Duties noted for medical and mental health staff include immediate medical intervention and proper referral for a forensic medical examination, as well as the follow-up treatment plan.</p> <p>The Plan then outlines the responsibilities of the supervisor and the detectives investigating such allegations. Responsibilities include notifications to the chain of command, rehousing to avoid potential contact with the abuser, and initial investigation steps.</p> <p>Lastly, the plan outlines the duties for the PREA Coordinator.</p> <p>The plan appears to be inclusive of the needs of the agency to ensure a prompt and thorough investigation is completed, with attention to the needs of the victim. The plan makes it easy for all staff to easily recall and identify their responsibilities should an incident of sexual abuse occur.</p> <p>During the onsite phase of the audit, the auditor reviewed the steps of the coordinated response plan with the Major, the Bureau Commander. He made it clear that having this document in place makes it easy for staff at the agency to promptly respond to incidents of sexual abuse and do it in a way to follow agency procedure and preserve evidence and protect the inmate victim. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: <i>(Policies, directives, forms, files, records, etc.)</i> <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>Collective Bargaining Agreement Between the Sarasota County Sheriff's Office and the Southwest Florida Policy Benevolent Association</i></li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.66(a).</b> In the PAQ, the auditor was provided a copy of the <i>Collective Bargaining Agreement Between the Sarasota County Sheriff's Office and the Southwest Florida Policy Benevolent Association</i>. The auditor reviewed the agreement and found no limitation for the agency to properly discipline a staff member or limit their contact with an inmate.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. The Major stated that the current bargaining agreement does not limit the agency's ability to discipline any staff member, if warranted. Any future agreements will not contain any such limitation. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.66(b).</b> The auditor is not required to audit this provision.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol data-bbox="339 387 863 445" style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Inmate retaliation logs</li> </ol> </li> <li>2. Interviews: <ol data-bbox="339 488 560 577" style="list-style-type: none"> <li>1. Targeted inmates</li> <li>2. Agency head</li> <li>3. Specialized staff</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1477 757"><b>115.67(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. This policy states, "The sheriff's office will not tolerate any form of retaliation against those who report suspected sexual misconduct or participate in the investigation of such misconduct. All supervisions are charged with monitoring retaliation."</p> <p data-bbox="240 790 1430 880">During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who confirmed his responsibility to complete monitoring of staff and inmates that were reporters, victims, or witnesses of allegations of sexual abuse at the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 913 1398 972"><b>115.67(b).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. This policy states, "Accommodations will be made for those who fear retaliation for their role in the investigation of sexual misconduct."</p> <p data-bbox="240 1005 1490 1400">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who stated that the agency uses many ways to protect inmates from retaliation, including housing changes, transferring the inmate to another housing unit, and providing the inmate information about available emotional support services. The auditor interviewed the PREA coordinator, who is responsible for the retaliation monitoring. He told the auditor that he visits with victims shortly after receiving notification of the reported allegation and tells them about his role to monitor their safety. He tells them to contact him if they have a problem, offers them assistance, and provides them with information about the outside emotional support services. He visits the inmate periodically, every 30 days, and documents their meeting. This monitoring lasts for 90 days following the report of the allegation. If problems arise, he reports it immediately and can offer a transfer to another housing unit or locate a new work assignment, if needed. The auditor interviewed two inmates who had reported sexual abuse during the onsite audit. The auditor confirmed with both inmates that they were asked about possible retaliation. Each inmate stated that they did not have problems with staff or other inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1433 1465 1559"><b>115.67(c).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "90 days following a reported incident of sexual misconduct the conduct and treatment of the reporter/witnesses will be monitored to ensure no retaliation has taken place. Inmate monitoring shall receive periodic status checks." In the PAQ, the agency stated that there were no inmates that required monitoring past the 90-day mark.</p> <p data-bbox="240 1592 1493 1919">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who was asked about steps that would be taken if retaliation of a victim was suspected. The Major stated the victim would be interviewed and provided the opportunity to tell staff what problems might be occurring. If the victim fails to offer information, the Major may authorize the transfer of the inmate to another housing unit or to protective custody for protective purposes. The auditor interviewed the retaliation monitor, the PREA coordinator, who stated that he would review incident reports and housing assignments. He would also review medical information to attempt to determine if the inmate were having problems that were unreported. If necessary, the inmate would be separated to provide an opportunity for the inmate to speak freely to staff to and describe the problems that were occurring. The monitoring would continue for 90 days but could extend longer if it appeared to be necessary based on the inmate's behavior. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1953 1465 2042"><b>115.67(d).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "90 days following a reported incident of sexual misconduct the conduct and treatment of the reporter/witnesses will be monitored to ensure no retaliation has taken place. Inmate monitoring shall receive periodic status checks."</p> <p data-bbox="240 2076 1490 2134">During the onsite phase of the audit, the auditor interviewed the retaliation monitor, the PREA coordinator, who stated that he would review incident reports and housing assignments. He stated that his periodic checks are performed every 30 days.</p>

He can always see an inmate more frequently if behavior warrants that, but the procedure requests a visit with the inmate at 30-day intervals. He continues to monitor every day by reviewing records from his office but will only meet with the inmate every 30 days. He stated that monitoring can be continued if there appears to be a need based on the statements from the victim or from other indications. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.67(e).** In the PAQ, the facility provided *CO 440.03 Prison Rape Elimination Act (PREA)*. This policy states, "The sheriff's office will not tolerate any form of retaliation against those who report suspected sexual misconduct or participate in the investigation of such misconduct. All supervisions are charged with monitoring retaliation."

During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who was asked about steps that would be taken if retaliation of any person who cooperated in an investigation was suspected. The Major stated the individual would be interviewed and provided the opportunity to tell staff what problems might be occurring. The agency would take immediate action to protect the individual. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.67(f).** The auditor is not required to audit this provision.

115.68	<p><b>Post-allegation protective custody</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. <i>CO 330.04 Classification</i></li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> <li>3. Site Review Observations:       <ol style="list-style-type: none"> <li>1. Segregated housing</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.68(a).</b> In the PAQ, the agency provided <i>CO 330.04 Classification</i>. The policy states, "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. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for no more than 24 hours while completing the assessment. The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. Inmates who have alleged to have suffered sexual abuse shall also be subject to requirements contained in this section." In the PAQ the agency stated there were no inmates involuntarily segregated following the report of a sexual abuse allegation over the last 12 months.</p> <p>During the onsite review, the auditor interviewed the Major, the Bureau Commander, about involuntary segregation. Just as he stated about segregation for risk of victimization, he said that the agency does not see the need to utilize confinement to keep inmates safe. If it were to become necessary to place an inmate in segregation, it would only be done until another alternative safe housing became available. The auditor also interviewed two staff members that work in segregated housing who confirmed that inmates are not placed in segregated housing to keep them safe following the filing of allegations of sexual abuse. The auditor interviewed two inmates who had been the victim of sexual abuse during the onsite audit. Neither inmate had been placed in segregated housing following the reporting of their allegation of sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. INV 210.12 Prison Rape Elimination Act (PREA)</li> <li>3. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> <li>2. Specialized staff</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1481 925"><b>115.71(a).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The Sheriff's Office shall provide access to services to victims via third party and shall conduct investigations of detainee sexual abuse/assault incidents to include third party and anonymous reporting." The auditor was also provided <i>INV 210.12 Prison Rape Elimination Act (PREA)</i> in the PAQ. INV 210.12 states, "It is the policy of the investigations bureau that sex crime investigations within the Sarasota County jail are conducted according to regulations established by the federal Prison Rape Elimination Act." The policy goes on to state, "The guidelines set forth in this policy shall be used to thoroughly investigate all allegations of sex crimes and shall ensure these investigations are conducted according to regulations established by the federal Rape and Elimination Act (PREA), while maintaining complete and accurate records."</p> <p data-bbox="240 958 1493 1216">During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective. The detective confirmed that he investigates all allegations of sexual abuse and sexual harassment. He is one of two detectives notified immediately upon the agency learning of the allegation and immediate steps are taken to preserve evidence upon learning of the allegation and initiating the investigation. The investigation process for third-party allegations is the same. The auditor reviewed the 23 sexual abuse investigation files from the previous 12 months prior to the audit and was able to confirm the investigative process. The referral to the investigator was completed immediately for each allegation. Most investigations were completed within one week unless additional investigation was required. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1249 1490 1344"><b>115.71(b).</b> The agency provided <i>INV 210.12 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "Detectives who may investigate sex crimes in the jail shall have specialized training, to include techniques for interviewing sex crime victims, proper use of Miranda and Garrity warnings, and sex crime evidence collection in confinement settings."</p> <p data-bbox="240 1377 1490 1500">During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective. The detective confirmed that he had taken the required specialized investigations course. The class covers interviewing sexual abuse victims, Miranda and Garrity, sexual abuse evidence collection in confinement, and preparing a case for referral. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1534 1490 1724"><b>115.71(c).</b> During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective, who confirmed that he investigates all PREA allegations just as he would all other cases. He collects evidence based on the standards of the Criminal Investigations Section (CIS). The investigation would include everything expected in this provision of the standard. He explained that a review of facility video evidence, telephone calls, and available DNA evidence would be a standard part of every sexual abuse investigation. They would also take statements from the victim and all available witnesses. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1758 1490 1818"><b>115.71(d).</b> The agency provided <i>INV 210.12 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "Interviews shall be conducted in accordance with investigations bureau manual policy # INV 110.12, Interviews and Interrogations."</p> <p data-bbox="240 1852 1490 2042">During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective, who stated that he does not conduct compelled interviews during the investigation. He would only utilize compelled interviews after any criminal investigation is completed and information was needed to conduct the administrative investigation. The auditor also interviewed the supervisor of the internal affairs unit, who reiterated that compelled interviews are not utilized unless it was absolutely necessary. He stated that they would wait for the criminal case to be completed before undertaking any additional interview with a suspected staff member. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 2076 1474 2136"><b>115.71(e).</b> The agency provided <i>INV 210.12 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis, and shall not be determined by</p>



the person's status as either a detainee or employee. Detainees who allege a sex crime shall not be required to submit to a polygraph as a condition of the investigation of his/her allegation."

During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective, who stated that he would not utilize polygraph examinations or other truth-telling devices as a means of determining whether to move forward with a PREA investigation. All cases and the credibility of subjects and witnesses is determined on an individual basis regardless of their status as an inmate. The auditor interviewed two inmates who had reported an allegation of sexual abuse during the onsite audit. Neither inmate was required to submit to a polygraph examination. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(f).** During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective. The detective confirmed that the administrative investigations include a review of all agency procedures to determine if the staff member followed all directives or if someone else failed to properly perform their duties, thus enabling an inmate or staff member to violate rules and commit an act of sexual misconduct. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(g).** During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective. The detective confirmed that he completes an investigative report to include a full description of the allegation, witness statements, evidence descriptions, and statements from the victim and accused. The investigator would attach the evidence and submit the full report to the CIS supervisor, facility Major, and PREA Coordinator for review. The auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit. Each of the files included a full and complete investigative report. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(h).** The agency provided *INV 210.12 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "Upon completion of an investigation, if it is determined that probable cause exists that a crime has been committed, an affidavit shall be submitted to the state attorney's office for prosecution."

During the onsite phase of the audit, the auditor interviewed a Sheriff's Office detective, who confirmed that any allegations where criminal charges were possible would be referred for prosecution as is required under the standard. The auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit. There was one substantiated allegation of inmate-on-inmate sexual abuse, which resulted in the filing of criminal charges against the abuser. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(i).** During the onsite audit, the auditor was shown storage of the investigation files in PREA coordinator's office. The files are stored in a secured cabinet and are marked for a retention period to ensure proper retention to meet the standard. The PREA coordinator confirmed that sexual abuse investigations are held for as long as the abuser is incarcerated or employed by the agency, plus five years. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(j).** The auditor was provided *INV 210.12 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "An investigation shall be completed, regardless of whether the detainee is currently in custody or not, and whether or not the suspect is incarcerated or employed by this agency."

The auditor interviewed a Sheriff's Office detective during the onsite audit. The detective stated that agency procedure and PREA standards require that investigators continue with sexual abuse investigations even if the alleged abuser or victim has been released from the facility or has left the employ of the agency. The detective stated that a crime must still be investigated even if the individual quits and tries to avoid arrest. The investigation must continue to its end and criminal and administrative proceedings will still result. The detective was not able to show the auditor an example, as he was not sure it had happened during an investigation. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.71(k).** The auditor is not required to audit this provision.

**115.71(l).** The auditor was provided *CO 440.03 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "Shall the investigation be required to be completed by an outside agency all personnel will cooperate fully with outside investigators and shall endeavor to remain informed about the investigation."

During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who stated that Sheriff's Office detectives promptly complete all PREA investigations. The detectives complete all investigations promptly and thoroughly. The Major has no doubt that cooperation and communication will exist if an outside agency is called upon to assist with any investigation. The auditor interviewed the PREA coordinator and was told all investigations are performed by Sheriff's Office detectives in conjunction with facility supervisors. Based on this analysis, the auditor finds the facility in compliance with this provision.

The auditor thoroughly reviewed each of the agency's 23 sexual abuse investigation files from the previous 12 months. The files were complete with the initial inmate report, documentation of the first responder's actions, contact with medical and

mental health, and notification to the Sheriff's Office to initiate the investigation. The investigative reports clearly defined the steps taken to review the allegation and the evidence collected and reviewed. Each of the investigations were initiated promptly, usually within one day of the report received by facility staff and were completed within one week unless additional investigation was required, or DNA evidence was requested by the laboratory. Additionally, the auditor found one suspect facing criminal charges following the successful completion of an investigation. This clearly meets the intention of the PREA standard. The agency's ability to cooperate with the law enforcement side of the agency enhances the ability of the agency to investigate all allegations thoroughly and promptly. This leads to better sexual safety in the Sarasota County Correctional Facility. Therefore, the auditor finds the agency to have exceeded this Standard.

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.72(a).</b> The auditor was provided CO 440.03 Prison Rape Elimination Act (PREA) in the PAQ. The policy states, "The sheriff's office requires no more than a preponderance of the evidence of sexual misconduct in determining whether allegations are substantiated."</p> <p>The auditor interviewed a Sheriff's Office detective during the onsite phase of the audit. The detective stated that the standard of proof for inmate sexual abuse investigations is a preponderance of the evidence. The auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit and the determination in each investigative memo is the preponderance of the evidence. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 544" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> </ol> <p data-bbox="240 573 501 600"><b>Findings (by provision):</b></p> <p data-bbox="240 633 1481 824"><b>115.73(a).</b> The auditor was provided CO 440.03 Prison Rape Elimination Act (PREA) in the PAQ. The policy states, "Following an investigation of sexual misconduct, the victim shall be notified that the allegation has been determined to be sustained, unsubstantiated, or unfounded." In the PAQ, the agency stated that there were 23 criminal or administrative investigations of sexual abuse completed by the agency investigators. Of those, 19 had received notification of the outcome of the investigation, with one investigation still open and the remaining three out of custody at the conclusion of the investigation.</p> <p data-bbox="240 857 1481 1182">During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse. Both inmates reported to the auditor they had received written notification of the completion of the investigation. The auditor interviewed a Sheriff's Office detective during the onsite phase of the audit. The detective stated that following the completion of the investigation, the inmate is notified of the outcome of the investigation verbally and in writing, and the inmate's signature is received to indicate receipt of the notification. The auditor also interviewed the Major, the Bureau Commander, during the onsite audit. The Major stated that all inmates are notified upon the completion of the investigation. They must be notified if the allegation is sustained, not sustained, or unfounded. The auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit. The auditor noted, in 19 of the 23 files, a document indicating the outcome of the investigation with the inmate's signature at the bottom of the form indicating receipt of the document. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1216 1417 1272"><b>115.73(b).</b> This provision does not apply, as the agency performs their own investigations of sexual abuse and sexual harassment allegations. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1305 1481 1462"><b>115.73(c).</b> The auditor was provided CO 440.03 Prison Rape Elimination Act (PREA) in the PAQ. The policy states, "If the accused was a staff member the victim will be notified (unless the allegation is unfounded): a. The staff member has been reassigned away from the victim; b. The staff member is no longer employed by this agency; c. The staff member has been indicted on a charge related to the sexual misconduct; d. The staff member has been convicted of a charge related the sexual misconduct."</p> <p data-bbox="240 1496 1481 1653">During the onsite phase of the audit, the auditor interviewed two inmates who had filed an allegation of sexual abuse. Neither allegation was filed against a staff member. The auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the audit. The auditor noted three allegations filed against a staff member, and the outcome of the three investigations was unfounded. Therefore, there was no additional documentation for the auditor to review. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1686 1481 1809"><b>115.73(d).</b> The auditor was provided CO 440.03 Prison Rape Elimination Act (PREA) in the PAQ. The policy states, "Furthermore, if the accused was another detainee the victim will be notified whenever: a. The agency has learned that the alleged abuser has been indicted on a charge related the sexual misconduct; or b. The agency has learned that the alleged abuser has been convicted of a crime related the sexual misconduct."</p> <p data-bbox="240 1843 1481 2000">During the onsite phase of the audit, the auditor interviewed two inmates who had filed an allegation of sexual abuse. Both allegations were filed against another inmate and both investigations were unsubstantiated, so criminal charges were not filed. The auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the audit. The auditor located the inmate notification in the only file where criminal charges had been filed against the abuser. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 2033 1481 2089"><b>115.73(e).</b> In the PAQ, the auditor was provided CO 440.03 Prison Rape Elimination Act (PREA). The policy states, "These notifications or attempted notifications will be documented in Records."</p> <p data-bbox="240 2123 1481 2157">During the onsite phase of the audit, the auditor reviewed the agency's 23 sexual abuse investigation files from the previous</p>

12 months prior to the audit. The auditor noted, in 19 of the 23 files, a document indicating the outcome of the investigation with the inmate's signature at the bottom of the form indicating receipt of the document. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.73(f).** The auditor is not required to audit this provision

115.76	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 1094 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>GO 12.2 Disciplinary Standards for Professional and Personal Conduct</i></li> <li>3. <i>GO 12.4 Anti-Harassment Policy</i></li> <li>4. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized interviews</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1485 992"><b>115.76(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If such accusations are founded members will be disciplined as outlined in General Orders 12.2 Discipline Standards for Professional and Personal Conduct to include possible termination." The auditor was provided <i>GO 12.2 Disciplinary Standards for Professional and Personal Conduct</i> in the PAQ. The policy promotes a pattern of behavior consistent with the philosophy of the sheriff's office that is reflective of professional law enforcement services. The policy lists over 100 Disciplinary Standards violations and on page 9, the policy lists <b>Commission of a Crime: (Level Five Violation)</b>, and states that members shall not commit any felony, or misdemeanor crime. The auditor was also provided <i>GO 12.4 Anti-Harassment Policy</i> in the PAQ, which states, "Harassment, discrimination, creating a hostile work environment, or retaliation in the workplace are very serious and may result in official agency action, including but not limited to discipline including termination."</p> <p data-bbox="240 1025 1485 1149">During the onsite phase of the audit, the auditor reviewed the agency's 31 sexual abuse investigation files from the previous 12 months prior to the audit. There were no substantiated allegations against a staff member. The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last year. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1182 1485 1541"><b>115.76(b).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If such accusations are founded members will be disciplined as outlined in General Orders 12.2 Discipline Standards for Professional and Personal Conduct to include possible termination." The auditor was provided <i>GO 12.2 Disciplinary Standards for Professional and Personal Conduct</i> in the PAQ. The policy promotes a pattern of behavior consistent with the philosophy of the sheriff's office that is reflective of professional law enforcement services. The policy lists over 100 Disciplinary Standards violations and on page 9, the policy lists <b>Commission of a Crime: (Level Five Violation)</b>, and states that members shall not commit any felony, or misdemeanor crime. The auditor was also provided <i>GO 12.4 Anti-Harassment Policy</i> in the PAQ, which states, "Harassment, discrimination, creating a hostile work environment, or retaliation in the workplace are very serious and may result in official agency action, including but not limited to discipline including termination." In the PAQ, the agency stated there were no terminations or resignations of staff members related to staff sexual abuse allegations over the 12 months prior to the audit.</p> <p data-bbox="240 1574 1485 1630">The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last year. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1664 1485 2056"><b>115.76(c).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "If such accusations are founded members will be disciplined as outlined in General Orders 12.2 Discipline Standards for Professional and Personal Conduct to include possible termination." The auditor was provided <i>GO 12.2 Disciplinary Standards for Professional and Personal Conduct</i> in the PAQ. The policy promotes a pattern of behavior consistent with the philosophy of the sheriff's office that is reflective of professional law enforcement services. The policy lists over 100 Disciplinary Standards violations and on page 12, lists <b>Treatment of Detainees: (Level Three Violation)</b>, and states, "Members shall not mistreat persons who are in their custody." The policy also lists <b>Harassment/Discrimination: (Level Five Violation)</b>, and states, "Members shall not engage in any form of illegal discrimination or interfere with any rights based on race, color, religion, sex, national origin, age, disability, pregnancy, sexual orientation, gender identity, marital status, or any other legally protected status. Members shall not engage in any discriminatory, harassing, or retaliatory conduct and shall comply with the agency's anti-harassment policy." In the PAQ, the agency stated the were no such disciplinary actions taken upon staff members over the 12 months prior to the audit.</p> <p data-bbox="240 2089 1485 2145">During the onsite phase of the audit, the auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit. There were no substantiated allegations against a staff member. There were no records of any</p>

staff member who had resigned or had been terminated. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.76(d).** In the PAQ, the facility provided *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "Certified staff members found to have committed a crime of sexual misconduct will be reported to F.D.L.E." In the PAQ, the agency stated there were no such reporting actions over the 12 months prior to the audit.

During the onsite phase of the audit, the auditor reviewed the agency's 23 sexual abuse investigation files from the previous 12 months prior to the audit. There were no substantiated allegations against a staff member. The auditor was unable to review additional evidence to confirm this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.77	<p><b>Corrective action for contractors and volunteers</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Agency head</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.77(a).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Upon completion of an investigation, if it is determined that a crime has been committed it shall be submitted to the State Attorney's Office for prosecution. Contractors or volunteers found to have committed sexual abuse or sexual harassment will be prohibited from contact with detainees." In the PAQ, the agency stated that there were no such reports to licensing bodies or to law enforcement over the last 12 months prior to the audit.</p> <p>During the onsite phase of the audit, the auditor reviewed the agency's 31 sexual abuse investigation files for the previous 12 months and did not find any allegations made against a volunteer or contractor. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.77(b).</b> In the PAQ, the agency provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "Upon completion of an investigation, if it is determined that a crime has been committed it shall be submitted to the State Attorney's Office for prosecution. Contractors or volunteers found to have committed sexual abuse or sexual harassment will be prohibited from contact with detainees."</p> <p>The auditor interviewed the Major, the Bureau Commander, during the onsite phase of the audit. The Major stated that although such remedial measures were certainly an option, the agency would review each situation independently, and decide whether to allow the individual to remain providing services in the facility or to permanently terminate them. The Major stated there were no such cases in the past 12 months. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.78	<b>Disciplinary sanctions for inmates</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 510" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 420.01 Inmate Rules and Discipline</li> <li>2. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> </ol> </li> </ol> <p data-bbox="242 539 501 568"><b>Findings (by provision):</b></p> <p data-bbox="242 598 1469 824"><b>115.78(a).</b> In the PAQ, the agency provided <i>CO 420.01 Inmate Rules and Discipline</i>. The policy establishes guidelines for acceptable inmate behavior and a system of prohibitions, penalties and corrective measures that deal with conduct that causes or threatens to cause harm to self, to others, to property, or is disruptive of institutional operations. Section C in the policy is entitled <i>The Disciplinary Hearing</i> and lists the proper steps of the inmate disciplinary process. The policy lists <i>Prohibited Acts</i> in Section D. Prohibited act number five is listed as, “Engaging in sexual acts with self or others.” The agency stated in the PAQ that there were seven inmates disciplined for offenses of sexual abuse over the last 12 months prior to the audit.</p> <p data-bbox="242 855 1477 949">During the onsite phase of the audit, the auditor reviewed the agency’s 23 sexual abuse investigation files from the previous 12 months. The auditor noted seven files where the inmate abuser was issued an internal disciplinary report. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 981 1485 1072"><b>115.78(b).</b> In the PAQ, the agency provided <i>CO 420.01 Inmate Rules and Discipline</i>. The policy states, “Sanctions shall be commensurate with the nature and circumstances of the offense committed, the inmate’s discipline history, and the sanctions imposed for comparable offenses by other inmates with similar histories.”</p> <p data-bbox="242 1104 1469 1232">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander, who confirmed that inmate discipline would be consistent with the level and type of offense committed. The penalty assigned would be consistent for comparable offenses and consistent for all inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1263 1453 1323"><b>115.78(c).</b> In the PAQ, the agency provided <i>CO 420.01 Inmate Rules and Discipline</i>. The policy states, “The disciplinary hearing sergeant shall consider whether mental disabilities or mental illness contributed to the inmate’s behavior.”</p> <p data-bbox="242 1355 1485 1482">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. The Major stated that any disciplinary process would consider the inmate’s mental disability or mental illness if it were noted by mental health staff. This would be considered when reviewing potential disciplinary sanctions to be imposed. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1514 1485 1641"><b>115.78(d).</b> During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health staff. All three stated that since the county jail was population was transient, they did not offer sexual offender therapy or counseling. Therefore, the facility was not able to offer such interventions for inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1673 1453 1765"><b>115.78(e).</b> The agency has provided the auditor with <i>CO 420.01 Inmate Rules and Discipline</i>. The policy states Inmates may be disciplined for sexual contact with staff only upon finding that the staff member did not consent to such contact. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1796 1485 1955"><b>115.78(f).</b> The agency has provided the auditor with <i>CO 420.01 Inmate Rules and Discipline</i>. The policy states, “For the purposes of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.” Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1986 1477 2078"><b>115.78(g).</b> In the PAQ, the agency provided <i>CO 420.01 Inmate Rules and Discipline</i>. The policy lists <i>Prohibited Acts</i> in Section D. Prohibited act number five is listed as, “Engaging in sexual acts with self or others.” Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

**The following evidence was analyzed in making the compliance determination:**

1. Documents: (*Policies, directives, forms, files, records, etc.*)
  1. *CO 440.03 Prison Rape Elimination Act (PREA)*
  2. *NaphCare J/P\_E-05 Mental Health Screening and Evaluation*
  3. Mental Health log
2. Interviews:
  1. Specialized staff
  2. Targeted inmates
3. Site Review Observations:
  1. Medical services

**Findings (by provision):**

**115.81(a).** This provision is for prisons and does not apply to the Sarasota County Correctional Facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.81(b).** This provision is for prisons and does not apply to the Sarasota County Correctional Facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.81(c).** The agency provided *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "All detainees entering the facility are screened by the facility's medical personnel and the classification unit. When a detainee reports having been a victim of sexual abuse/assault and expresses a willingness to participate in treatment for same, staff shall refer the detainee to the facility's mental health personnel, who shall assess the detainee's need for treatment and discuss available treatment options if appropriate." The auditor was provided *NaphCare J/P\_E-05 Mental Health Screening and Evaluation* in the PAQ. This policy governs the actions of the contracted medical and mental health staff at the facility. The policy states, "All patients entering the correctional institution will receive a mental health screen within fourteen days of the patient's arrival to the institution. The mental health evaluation is to be conducted in a timely manner as dictated by the nature of the referral." In the PAQ, the agency provided the auditor with a copy of the Mental Health log, which shows each inmate that was provided the mental health referral either at intake or due to an incident of sexual abuse. The log shows the date the referral was completed, which in every instance, was completed within the required 14-day period.

During the onsite phase of the audit, the auditor interviewed three inmates who reported prior sexual victimization on their risk screening. All three inmates told the auditor that they were provided the opportunity to meet with someone from mental health. They told the auditor that initial meeting happened within the first two weeks in the facility. The auditor also interviewed three staff members from medical and mental health, who confirmed that if an inmate reported prior victimization, the inmate would be provided the opportunity to see medical or mental health. Those scheduled visits were tracked on a log, which was provided to the auditor for his review. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.81(d).** The agency provided *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "Information concerning the identity of a detainee victim reporting a sexual assault, 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 detainee-victim's welfare and for law enforcement/investigative purposes."

During the onsite phase of the audit, the auditor talked with several staff members while performing the site review. Staff members were asked about the screening of inmates and how to access the screening information in the computer. The auditor was told they were unable to access that information in the computer. The auditor asked three officers to access the computer and show him the screening information and they were unable to do so. The auditor was assured by the Classification Manager and PREA Coordinator that access to the screening tool's data was restricted to classification personnel and other staff members that have a legitimate need to access the information. Medical and mental health information is secured in the agency's medical records system and is not accessible by other agency staff. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.81(e).** During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health staff. All three explained that obtaining informed consent is a regular part of the agency's process prior to engaging in services with inmates. Upon learning of an inmate's sexual assault history and prior to contacting security staff, the clinician will remind the inmate about the consent form and clinician's mandatory reporting requirements. For inmates under the age of 18 this is not a requirement, due to State law. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.82	<b>Access to emergency medical and mental health services</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

**The following evidence was analyzed in making the compliance determination:**

1. Documents: (*Policies, directives, forms, files, records, etc.*)
  1. *CO 440.03 Prison Rape Elimination Act (PREA)*
  2. *NaphCare J/P-F-06 Response to Sexual Assault*
  3. Sexual abuse investigation files
2. Interviews:
  1. Specialized staff
  2. Targeted inmates

**Findings (by provision):**

**115.82(a).** In the PAQ, the auditor was provided *NaphCare J/P-F-06 Response to Sexual Assault*. The policy states, "This SANE evaluation may be conducted onsite if available to the facility. If no onsite SANE evaluation is available, or if the patient has sustained injuries needing a higher level of care, transport of the patient to the hospital will be arranged with custody staff. Emergency medical treatment may be provided by onsite health staff as clinically indicated." The auditor was also provided *CO 440.03 Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "Any detainee who alleges he/she has been sexually assaulted shall be offered immediate protection from the assailant and shall be referred for a medical and mental health examination and a clinical assessment of the potential for suicide or other related symptomatology at no cost." The auditor was provided access to medical records for several inmates who had reported incidents of sexual abuse over the 12 months prior to the audit. The auditor was able to verify the immediate medical response and evaluation of the inmate victim.

During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health department. All three confirmed that any inmate who was the victim of sexual abuse would be immediately brought to the medical department as part of the coordinated response plan to an allegation of sexual abuse. The first step taken would be to evaluate the inmate for injuries and the urgent need for medical care. Special care would be taken to ensure that any evidence would be preserved. This evaluation is done immediately and is based on the medical professional's credentials. A medical professional is on duty 24 hours a day at the facility and there would be no waiting for care from a medical professional. The auditor interviewed two inmates who reported sexual abuse during the onsite audit, and both confirmed they were seen by a medical professional following the report of the allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.82(b).** The auditor interviewed two staff members who were first responders to allegations of sexual abuse during the onsite phase of the audit. Both understood the immediate need to provide the inmate with access to medical and mental health. They told the auditor that medical staff is always available and there is no need for security staff to make other arrangements. Although mental health staff is not on duty 24-hours a day, appointments are scheduled for an immediate meeting with a mental health practitioner, which would normally occur the following day. If staff believe there is an urgent need for the inmate victim to see mental health, a mental health staff member can be called for an immediate response to the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.82(c).** In the PAQ the auditor was provided *NaphCare J/P-F-06 Response to Sexual Assault*. The policy states, "After completion of the SANE evaluation, onsite health staff shall obtain provider orders for timely implementation of any treatment recommendations especially those for treatment and/or prevention of sexually transmitted diseases or pregnancy. For offender victims and perpetrators, medical staff will ensure provisions are made for testing for sexually transmitted diseases, unless already completed by emergency department personnel. Prophylactic treatment will be offered, as appropriate."

During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health department. All three confirmed that any inmate who was the victim of sexual abuse would be immediately brought to the medical department as part of the coordinated response plan to an allegation of sexual abuse. Testing and treatment for sexually transmitted infections would be coordinated through a follow-up treatment plan provided by the SANE at SMH. This is true for pregnancy-related services as well. The auditor was told that there were no pregnancy-related cases over the last year, but one forensic examination was performed that would have required prophylactic testing. The auditor interviewed two inmates who reported sexual abuse, but neither alleged sexual abuse that required a forensic exam or prophylactic testing. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.82(d).** *CO 440.03 Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Any detainee who alleges he/she has been sexually assaulted shall be offered immediate protection from the assailant and shall be referred for a medical and mental health examination and a clinical assessment of the potential for suicide or other related symptomatology at no cost." Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. NaphCare J/P-F-06 Response to Sexual Assault</li> <li>3. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Targeted inmates</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1485 790"><b>115.83(a).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "Any detainee who alleges he/she has been sexually assaulted shall be offered immediate protection from the assailant and shall be referred for a medical and mental health examination and a clinical assessment of the potential for suicide or other related symptomatology at no cost." Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 824 1485 913"><b>115.83(b).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "Upon the victim's arrival back to the facility the victim shall be referred to medical and mental health personnel for treatment and continued care planning."</p> <p data-bbox="240 947 1485 1137">During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health department. All three confirmed for the auditor that the facility would provide a full treatment plan for all inmates, especially for inmates who have been sexually abused. The treatment plan would include information from SMH if the victim had received a forensic examination. The auditor interviewed two inmates who had reported sexual abuse, but neither had been abused to the extent that a forensic examination was necessary. There was no treatment plan in place. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1171 1485 1294"><b>115.83(c).</b> During the onsite phase of the audit, the auditor interviewed three staff members from the medical and mental health department. All three confirmed for the auditor that all services provided to the facility's inmates are always consistent with care that would be provided outside the institution. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1328 1485 1384"><b>115.83(d).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "The victim shall be offered pregnancy tests."</p> <p data-bbox="240 1417 1485 1574">During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse. Neither inmate had been vaginally penetrated and did not require pregnancy testing. The auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the audit. None of the cases involved vaginal penetration of the inmate victim, so the auditor was unable to confirm additional information for this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1608 1485 1731"><b>115.83(e).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "Victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical service." The auditor was also provided NaphCare J/P-F-06 Response to Sexual Assault in the PAQ. The policy states, "Emergency contraception is made available as clinically indicated."</p> <p data-bbox="240 1765 1485 1921">During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse. Neither inmate had been vaginally penetrated and did not require pregnancy testing. The auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the audit. None of the cases involved vaginal penetration of the inmate victim, so the auditor was unable to confirm additional information for this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1955 1485 2045"><b>115.83(f).</b> In the PAQ the auditor was provided NaphCare J/P-F-06 Response to Sexual Assault. The policy states, "For offender victims and perpetrators, medical staff will ensure provisions are made for testing for sexually transmitted diseases, unless already completed by emergency department personnel. Prophylactic treatment will be offered, as appropriate."</p> <p data-bbox="240 2078 1485 2134">During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse, but neither had been abused to the extent that required testing for sexually transmitted infections. The auditor reviewed the agency's 23</p>

sexual abuse investigation files from the 12 months prior to the audit. The auditor noted one file where the inmate victim had been abused to the extent that such testing was necessary, and it was appropriately noted in the file. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.83(g).** *CO 440.03 Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Any detainee who alleges he/she has been sexually assaulted shall be offered immediate protection from the assailant and shall be referred for a medical and mental health examination and a clinical assessment of the potential for suicide or other related symptomatology at no cost."

During the onsite phase of the audit, the auditor interviewed two inmates who had reported sexual abuse. Neither inmate was charged for any of the medical or mental health services provided to them following the report of sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.83(h).** This provision is for prisons and does not apply to the Sarasota County Correctional Facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 1086 297"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 577" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. Sexual Abuse Incident Review documents</li> <li>3. Sexual abuse investigation files</li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. Specialized staff</li> <li>2. Incident review team</li> </ol> </li> </ol> <p data-bbox="240 607 501 633"><b>Findings (by provision):</b></p> <p data-bbox="240 667 1461 792"><b>115.86(a).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The Corrections Operations Bureau Commander will review within 30 days of the conclusion of every criminal or administrative PREA incident." In the PAQ, the agency reported there were 12 such incident review meetings completed following sexual abuse investigations over the last 12 months prior to the audit.</p> <p data-bbox="240 824 1485 916">During the onsite phase of the audit, the auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the onsite audit. The auditor located the incident review form in the investigation files where the investigation outcome was not unfounded. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 947 1461 1039"><b>115.86(b).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The Corrections Operations Bureau Commander will review within 30 days of the conclusion of every criminal or administrative PREA incident."</p> <p data-bbox="240 1070 1485 1196">During the onsite phase of the audit, During the onsite phase of the audit, the auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the onsite audit. The auditor located the incident review form in the investigation files where the investigation outcome was not unfounded. The incident review was completed in each case within the 30-day period. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1227 1485 1352"><b>115.86(c).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The review will allow for input from supervisors, investigators, and medical and mental health practitioners." The auditor was provided copies of two completed sexual abuse incident reviews in the PAQ. The reviews show the team included the PREA Coordinator, the Bureau Commander, and a Security Operations Captain.</p> <p data-bbox="240 1384 1493 1644">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. The Major explained that the incident reviews following completed investigations were extremely important to the process to ensure sexual safety. The incident review is the best way to evaluate policy failures, physical plant issues, inmate motivations, or staff failures which may have led to the inmate's opportunity perpetrate sexual abuse within the facility. Involving the correct administrative staff as well as shift personnel ensures the agency receives a complete picture of exactly what happened during the incident. The auditor reviewed the agency's 23 sexual abuse investigation files from the 12 months prior to the onsite audit. The auditor located the incident review form in the investigation files where the investigation outcome was not unfounded. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1675 1477 2002"><b>115.86(d).</b> In the PAQ, the facility provided <i>CO 440.03 Prison Rape Elimination Act (PREA)</i>. The policy states, "The review will consist of the following: a. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; b. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; d. Assess the adequacy of staffing levels in that area during different shifts; e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and f. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (2)(a) through (2)(e) of this section, and any recommendations for improvement and submit such report to the facility head and PREA Coordinator/Compliance Manager."</p> <p data-bbox="240 2033 1437 2136">During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who participates in the sexual abuse incident reviews. He confirmed for the auditor that each incident review includes a review of all the items listed in this provision. He said that without this full review, the agency would not continue to improve and provide an atmosphere of</p>



sexual safety. The auditor interviewed the PREA coordinator as well. He made it clear that these incident reviews are important for the facility to not just say that sexual safety is important, but to show to staff and all of administration that it is important. If they identify an action that must be taken following the review, the action must be taken immediately. The auditor also interviewed the Major, the Bureau Commander, about the sexual abuse incident reviews. He explained that the incident reviews following completed investigations were extremely important to the process to ensure sexual safety. The incident review is the best way to evaluate policy failures, physical plant issues, inmate motivations, or staff failures which may have led to the inmate's opportunity perpetrate sexual abuse within the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

**115.86(e).** In the PAQ, the facility provided *CO 440.03 Prison Rape Elimination Act (PREA)*. The policy states, "The bureau under which an incident of sexual misconduct occurred shall implement the recommendations for improvement or shall document its reasoning for not doing so."

The auditor interviewed the Major, the Bureau Commander, about the sexual abuse incident reviews during the onsite phase of the audit. He explained that the incident reviews following completed investigations were extremely important to the process to ensure sexual safety. The incident review is the best way to evaluate policy failures, physical plant issues, inmate motivations, or staff failures which may have led to the inmate's opportunity perpetrate sexual abuse within the facility. If for some reason the decision is made to not institute the recommendations made in the incident review report, administration would document the reasons why and maintain that documentation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.87	<b>Data collection</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 479" style="list-style-type: none"> <li>1. Documents: <i>(Policies, directives, forms, files, records, etc.)</i> <ol data-bbox="339 387 863 479" style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>2019 Survey of Sexual Victimization</i></li> <li>3. <i>2021 PREA Annual Report</i></li> </ol> </li> </ol> <p data-bbox="242 508 501 537"><b>Findings (by provision):</b></p> <p data-bbox="242 566 1481 725"><b>115.87(a).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will collect and review uniform data from all incidents concerning sexual abuse, sexual harassment, or voyeurism involving detainees. Sex abuse data will be aggregated annually. Collected data must satisfy the <i>DOJ Survey of Sexual Violence</i>. Such data will be maintained and retained for at least 10 years." Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 757 1481 983"><b>115.87(b).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will collect and review uniform data from all incidents concerning sexual abuse, sexual harassment, or voyeurism involving detainees. Sex abuse data will be aggregated annually. Collected data must satisfy the <i>DOJ Survey of Sexual Violence</i>. Such data will be maintained and retained for at least 10 years." The agency provided the auditor with a copy of the <i>2021 PREA Annual Report</i>. The auditor reviewed the report and noted the annual data aggregated for 2020 and 2021 on the report. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1014 1490 1276"><b>115.87(c).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will collect and review uniform data from all incidents concerning sexual abuse, sexual harassment, or voyeurism involving detainees. Sex abuse data will be aggregated annually. Collected data must satisfy the <i>DOJ Survey of Sexual Violence</i>. Such data will be maintained and retained for at least 10 years." The auditor's review of the agency's <i>2021 PREA Annual Report</i> included verification of the presence of the <i>Department of Justice (DOJ) Survey of Sexual Violence (SSV-3)</i> definitions in the report, as well as the data included with those definitions. The auditor was also provided the agency's <i>2019 Survey of Sexual Victimization</i> in the PAQ. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1308 1481 1467"><b>115.87(d).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will collect and review uniform data from all incidents concerning sexual abuse, sexual harassment, or voyeurism involving detainees. Sex abuse data will be aggregated annually. Collected data must satisfy the <i>DOJ Survey of Sexual Violence</i>. Such data will be maintained and retained for at least 10 years." Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1498 1490 1559"><b>115.87(e).</b> The agency does not contract with any facility or contracted agency for the confinement of its inmates. Therefore, this provision does not apply. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="242 1590 1490 1682"><b>115.87(f).</b> The agency completes the <i>Survey of Sexual Violence (SSV)</i> when the request is received from the Department of Justice. The auditor was provided the agency's <i>2019 Survey of Sexual Victimization</i> in the PAQ. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.88	<b>Data review for corrective action</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 1086 300"><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol data-bbox="276 349 906 546" style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. <i>CO 440.03 Prison Rape Elimination Act (PREA)</i></li> <li>2. <i>2021 PREA Annual Report</i></li> <li>3. <i>Sarasota County Sheriff's Office website</i></li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. <i>Specialized staff</i></li> </ol> </li> </ol> <p data-bbox="240 573 501 600"><b>Findings (by provision):</b></p> <p data-bbox="240 631 1490 824"><b>115.88(a).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will analyze the data to make recommendations to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, staffing, and training on an annual basis." The agency provided the auditor with a copy of the <i>2021 PREA Annual Report</i>. The auditor reviewed the report and noted the report's review of the annual data and discussion of the agency's findings and concerns related to the allegations and outcomes in the facility. The report also included a corrective action plan.</p> <p data-bbox="240 855 1490 1115">The auditor interviewed the Major, the Bureau Commander, during the onsite phase of the audit and discussed the agency's annual report. He stated the report is prepared by the PREA Coordinator utilizing the agency's annual data and then submitted to him for review and approval. The report includes a corrective action plan based on indications found in the annual data. The auditor interviewed the PREA Coordinator who confirmed the annual data collection. He stated he reviews the outcomes of the sexual abuse investigations as well as the locations of the incidents. He looks for patterns of behavior or common trends. All issues are reviewed, and actions are taken for prevention of future incidents, which may require training and education. This information is then written into the annual corrective action plan. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1146 1490 1308"><b>115.88(b).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "The PREA Coordinator/Compliance Manager will analyze the data to make recommendations to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, staffing, and training on an annual basis." The auditor noted this comparison in the provided agency annual report for 2021. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1339 1490 1429"><b>115.88(c).</b> The agency provided the auditor with <i>CO 440.03 Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "Statistics compiled by the PREA Coordinator/Compliance Manager will be posted on the Sheriff's Office website on an annual basis."</p> <p data-bbox="240 1460 1490 1590">During the onsite phase of the audit, the auditor interviewed the Major, the Bureau Commander. He stated the report is prepared by the PREA Coordinator utilizing the agency's annual data and then submitted to him for review and approval. The agency's 2021 report was located on the Sarasota County Sheriff's Office website. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="240 1621 1490 1751"><b>115.88(d).</b> During the onsite phase of the audit, the auditor interviewed the PREA coordinator who stated that the annual report is posted without redacted information. The annual report is written without data that would require redaction. The auditor reviewed the 2021 report and noted no redacted information or personally identifiable information in the report. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.89	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. CO 440.03 Prison Rape Elimination Act (PREA)</li> <li>2. 2021 PREA Annual Report</li> <li>3. Sarasota County Sheriff's Office website</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. PREA coordinator</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.89(a).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "Such data will be maintained and retained for at least 10 years."</p> <p>The auditor interviewed the PREA coordinator during the onsite phase of the audit. The PREA coordinator confirmed that all the data is maintained on the secure computer server or in a locked cabinet in his secure office. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.89(b).</b> The agency's 2021 report was located on the Sarasota County Sheriff's Office website. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.89(c).</b> The auditor reviewed the 2021 report supplied to the auditor for review and noted no redacted information or personally identifiable information in the report. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.89(d).</b> CO 440.03 Prison Rape Elimination Act (PREA) was provided to the auditor in the PAQ. The policy states, "Such data will be maintained and retained for at least 10 years." Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.401	<p><b>Frequency and scope of audits</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> <li>1. Agency website</li> </ol> </li> <li>2. Interviews: <ol style="list-style-type: none"> <li>1. PREA coordinator</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.401(a).</b> This was the third audit completed by the Sarasota County Correctional Facility. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.401(b).</b> This is the third year of the third PREA audit cycle. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.401(h).</b> During the onsite phase of the audit, the auditor was given the opportunity to complete a full site review. This included full access to all areas of the institution, so the auditor could assess all operations and talk with staff and inmates. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.401(i).</b> During the onsite phase of the audit, the auditor was provided with all documentation requested to properly review and verify all operations related to the PREA standards. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.401(m).</b> During the onsite phase of the audit, the auditor requested to interview a total of 34 inmates. The institution provided a private room for the auditor to meet with each inmate for the interview, without interruption. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p><b>115.401(n).</b> The institution posted the required audit notice in every housing unit, on colored paper, printed in two languages. The notices were also seen in public areas throughout the institution, in the public lobby and in the visitation building. The audit notice included the auditor’s contact information and explained the process to send confidential information or correspondence. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following evidence was analyzed in making the compliance determination:</b></p> <ol style="list-style-type: none"> <li>1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)       <ol style="list-style-type: none"> <li>1. Agency website</li> </ol> </li> <li>2. Interviews:       <ol style="list-style-type: none"> <li>1. PREA coordinator</li> </ol> </li> </ol> <p><b>Findings (by provision):</b></p> <p><b>115.403(f).</b> This was the third audit completed by the Sarasota County Correctional Facility. The prior audit report is posted to the Sarasota County Correctional Facility website as required by this provision and the auditor understands that this audit report will be posted properly after the agency receives it. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

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

<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for 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
<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes



<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
<b>115.17 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

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

<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes



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

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

<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

<b>115.42 (d)</b>	<b>Use of screening information</b>	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

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

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



<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

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

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes



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

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

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

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