# PREA Facility Audit Report: Final

**Name of Facility:** Henrico County Regional Jail West
**Facility Type:** Prison / Jail
**Date Interim Report Submitted:** NA
**Date Final Report Submitted:** 08/13/2024

| Auditor Certification | |
|---|---|
| The contents of this report are accurate to the best of my knowledge. | ☑ |
| No conflict of interest exists with respect to my ability to conduct an audit of the agency under review. | ☑ |
| 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. | ☑ |
| **Auditor Full Name as Signed:** Alton Baskerville | **Date of Signature:** 08/13/2024 |

| AUDITOR INFORMATION | |
|---|---|
| **Auditor name:** | Baskerville, Alton |
| **Email:** | alton.abm@preaauditors.com |
| **Start Date of On-Site Audit:** | 06/26/2024 |
| **End Date of On-Site Audit:** | 06/28/2024 |

| FACILITY INFORMATION | |
|---|---|
| **Facility name:** | Henrico County Regional Jail West |
| **Facility physical address:** | 4301 East Parham Road, Henrico, Virginia - 23228 |
| **Facility mailing address:** | 4317 E. Parham Rd, Henrico, Virginia - 23228 |

| Primary Contact |
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|---|---|
| **Name:** | Allison Saunders |
| **Email Address:** | sau020@henrico.us |
| **Telephone Number:** | 804-501-5570 |

| **Warden/Jail Administrator/Sheriff/Director** | |
|---|---|
| **Name:** | ReShonda R. Roane |
| **Email Address:** | roa02@henrico.us |
| **Telephone Number:** | 804-501-5750 |

| **Facility PREA Compliance Manager** | |
|---|---|
| **Name:** | Necea Montague |
| **Email Address:** | mon22@henrico.us |
| **Telephone Number:** | M: (804) 501-5703 |

| **Facility Health Service Administrator On-site** | |
|---|---|
| **Name:** | Michael Smithers |
| **Email Address:** | smi43@henrico.us |
| **Telephone Number:** | 804-350-7831 |

| **Facility Characteristics** | |
|---|---|
| **Designed facility capacity:** | 686 |
| **Current population of facility:** | 649 |
| **Average daily population for the past 12 months:** | 589 |
| **Has the facility been over capacity at any point in the past 12 months?** | No |
| **Which population(s) does the facility hold?** | Both females and males |

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| **Age range of population:** | 18-86 |
| **Facility security levels/inmate custody levels:** | minimum- maximum |
| **Does the facility hold youthful inmates?** | No |
| **Number of staff currently employed at the facility who may have contact with inmates:** | 205 |
| **Number of individual contractors who have contact with inmates, currently authorized to enter the facility:** | 144 |
| **Number of volunteers who have contact with inmates, currently authorized to enter the facility:** | 60 |

| **AGENCY INFORMATION** | |
|---|---|
| **Name of agency:** | Henrico County Sheriff's Office |
| **Governing authority or parent agency (if applicable):** | |
| **Physical Address:** | 4301 East Parham Road, Henrico, Virginia - 23228 |
| **Mailing Address:** | |
| **Telephone number:** | |

| **Agency Chief Executive Officer Information:** | |
|---|---|
| **Name:** | |
| **Email Address:** | |
| **Telephone Number:** | |

| **Agency-Wide PREA Coordinator Information** | | | |
|---|---|---|---|
| **Name:** | Allison Saunders | **Email Address:** | sau020@henrico.us |

## Facility AUDIT FINDINGS

### Summary of Audit Findings

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

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

| **Number of standards exceeded:** | |
|---|---|
| 0 | |
| **Number of standards met:** | |
| 45 | |
| **Number of standards not met:** | |
| 0 | |

## POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

| | |
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| **1. Start date of the onsite portion of the audit:** | 2024-06-26 |
| **2. End date of the onsite portion of the audit:** | 2024-06-28 |

### Outreach

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| **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?** | (●) Yes<br>( ) No |
| **a. Identify the community-based organization(s) or victim advocates with whom you communicated:** | Bon Secours Richmond Health System (St. Mary's Hospital)<br>YWCA Safe Harbor |

## AUDITED FACILITY INFORMATION

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| **14. Designated facility capacity:** | 685 |
| **15. Average daily population for the past 12 months:** | 589 |
| **16. Number of inmate/resident/detainee housing units:** | 23 |
| **17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?** | ( ) Yes<br>( ) No<br>(●) 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:** | 606 |
| **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:** | 5 |
| **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:** | 3 |
| **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:** | 2 |
| **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:** | 2 |
| **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:** | 14 |
| **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:** | 20 |

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| **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:** | 2 |
| **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:** | 1 |
| **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:** | 19 |
| **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):** | No additional comments noted. |
| **Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit** | |
| **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:** | 340 |
| **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:** | 26 |

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|---|---|
| **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:** | 84 |
| **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 additional comments noted. |

## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

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| **53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:** | 13 |
| **54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)** | ☑ Age<br>☑ Race<br>☑ Ethnicity (e.g., Hispanic, Non-Hispanic)<br>☑ Length of time in the facility<br>☑ Housing assignment<br>☑ Gender<br>☐ Other<br>☐ None |
| **55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?** | Residents were selected from all housing units. |
| **56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?** | ◉ Yes<br>○ No |

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| **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):** | There were no barriers to interviewing the random or targeted offenders. |
| **Targeted Inmate/Resident/Detainee Interviews** | |
| **58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:** | 17 |
| 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". | |
| **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:** | 2 |
| **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:** | 2 |
| **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 |

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| **63. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:** | 1 |
| **64. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:** | 1 |
| **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:** | 2 |
| **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:** | 1 |
| **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:** | 6 |

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| **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:** | ■ 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.<br><br>☐ 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).** | No additional comments noted. |
| **70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):** | Two (2) refused to be interviewed. No other barriers. |
| **Staff, Volunteer, and Contractor Interviews** | |
| **Random Staff Interviews** | |
| **71. Enter the total number of RANDOM STAFF who were interviewed:** | 12 |

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| **72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)** | ☐ Length of tenure in the facility<br>☑ Shift assignment<br>☑ Work assignment<br>☑ Rank (or equivalent)<br>☑ Other (e.g., gender, race, ethnicity, languages spoken)<br>☐ None |
| **If "Other," describe:** | Female and Male staff were interviewed. Henrico Regional Jail West houses both female and male offenders. |
| **73. Were you able to conduct the minimum number of RANDOM STAFF interviews?** | ◉ Yes<br>○ 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):** | Random staff from all shifts were interviewed. |
| **Specialized Staff, Volunteers, and Contractor Interviews** | |
| Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements. | |
| **75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):** | 21 |
| **76. Were you able to interview the Agency Head?** | ◉ Yes<br>○ No |

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| **77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?** | (●) Yes<br>( ) No |
| **78. Were you able to interview the PREA Coordinator?** | (●) Yes<br>( ) No |
| **79. Were you able to interview the PREA Compliance Manager?** | (●) Yes<br>( ) No<br>( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards) |

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| **80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)** | ☑ Agency contract administrator<br><br>☑ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment<br><br>☐ Line staff who supervise youthful inmates (if applicable)<br><br>☐ Education and program staff who work with youthful inmates (if applicable)<br><br>☑ Medical staff<br><br>☑ Mental health staff<br><br>☑ Non-medical staff involved in cross-gender strip or visual searches<br><br>☑ Administrative (human resources) staff<br><br>☑ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff<br><br>☐ Investigative staff responsible for conducting administrative investigations<br><br>☑ Investigative staff responsible for conducting criminal investigations<br><br>☑ Staff who perform screening for risk of victimization and abusiveness<br><br>☑ Staff who supervise inmates in segregated housing/residents in isolation<br><br>☑ Staff on the sexual abuse incident review team<br><br>☑ Designated staff member charged with monitoring retaliation<br><br>☑ First responders, both security and non-security staff<br><br>☑ Intake staff |

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| | ☐ Other |
| **81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?** | ◉ Yes<br>○ No |
| **a. Enter the total number of VOLUNTEERS who were interviewed:** | 1 |
| **b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)** | ☐ Education/programming<br>☐ Medical/dental<br>☐ Mental health/counseling<br>☑ Religious<br>☐ Other |
| **82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?** | ◉ Yes<br>○ No |
| **a. Enter the total number of CONTRACTORS who were interviewed:** | 3 |
| **b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)** | ☐ Security/detention<br>☐ Education/programming<br>☑ Medical/dental<br>☐ Food service<br>☐ Maintenance/construction<br>☑ Other |
| **83. Provide any additional comments regarding selecting or interviewing specialized staff.** | Specialized staff were conveniently available for interviews. |

## 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.

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| **84. Did you have access to all areas of the facility?** | (●) Yes<br>( ) No |
| **Was the site review an active, inquiring process that included the following:** | |
| **85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?** | (●) Yes<br>( ) No |
| **86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?** | (●) Yes<br>( ) No |
| **87. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?** | (●) Yes<br>( ) No |
| **88. Informal conversations with staff during the site review (encouraged, not required)?** | (●) Yes<br>( ) No |

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| **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).** | All areas of the facility were accessible to the auditor. |

### 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.

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| **90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?** | (●) Yes<br>( ) No |
| **91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).** | Thirteen (13) .random offender record files were selected for review for each month of the audited period. Also, ten employee record files were randomly selected and reviewed. |

## 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** | 8 | 8 | 0 | 0 |
| **Staff-on-inmate sexual abuse** | 7 | 2 | 5 | 0 |
| **Total** | 15 | 10 | 5 | 0 |

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

| | # of sexual harassment allegations | # of criminal investigations | # of administrative investigations | # of allegations that had both criminal and administrative investigations |
|---|---|---|---|---|
| **Inmate-on-inmate sexual harassment** | 10 | 4 | 6 | 0 |
| **Staff-on-inmate sexual harassment** | 15 | 1 | 14 | 0 |
| **Total** | 25 | 5 | 20 | 0 |

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

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

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

| | Ongoing | Unfounded | Unsubstantiated | Substantiated |
|---|---|---|---|---|
| **Inmate-on-inmate sexual abuse** | 0 | 2 | 6 | 0 |
| **Staff-on-inmate sexual abuse** | 0 | 6 | 0 | 1 |
| **Total** | 0 | 8 | 6 | 1 |

### Sexual Harassment Investigation Outcomes

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

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

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

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

| | Ongoing | Unfounded | Unsubstantiated | Substantiated |
|---|---|---|---|---|
| **Inmate-on-inmate sexual harassment** | 0 | 6 | 4 | 0 |
| **Staff-on-inmate sexual harassment** | 0 | 15 | 0 | 0 |
| **Total** | 0 | 21 | 4 | 0 |

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

### Sexual Abuse Investigation Files Selected for Review

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|---|---|
| **98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:** | 15 |

| | |
|---|---|
| **99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any sexual abuse investigation files) |
| **Inmate-on-inmate sexual abuse investigation files** | |
| **100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:** | 8 |
| **101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?** | (●) Yes<br>( ) No<br>( ) 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?** | ( ) Yes<br>(●) No<br>( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) |
| **Staff-on-inmate sexual abuse investigation files** | |
| **103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:** | 7 |
| **104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) |

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| **105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) |
| **Sexual Harassment Investigation Files Selected for Review** | |
| **106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:** | 25 |
| **107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any sexual harassment investigation files) |
| **Inmate-on-inmate sexual harassment investigation files** | |
| **108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:** | 10 |
| **109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) |
| **110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) |

| Staff-on-inmate sexual harassment investigation files | |
|---|---|
| **111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:** | 15 |
| **112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) |
| **113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?** | (●) Yes<br>( ) No<br>( ) NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) |
| **114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.** | Files were thorough and easy to review. |

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

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| **115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.** | ( ) Yes<br>(●) No |

| Non-certified Support Staff | |
|---|---|
| **116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.** | (●) Yes<br>( ) No |
| **a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:** | 1 |
| **AUDITING ARRANGEMENTS AND COMPENSATION** | |
| **121. Who paid you to conduct this audit?** | (●) The audited facility or its parent agency<br>( ) My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)<br>( ) A third-party auditing entity (e.g., accreditation body, consulting firm)<br>( ) Other |

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| **Auditor Overall Determination Definitions** |
| • Exceeds Standard<br>(Substantially exceeds requirement of standard)<br><br>• Meets Standard<br>(substantial compliance; complies in all material ways with the stand for the relevant review period)<br><br>• Does Not Meet Standard<br>(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 | Zero tolerance of sexual abuse and sexual harassment; PREA coordinator |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, 05/2021<br>• Organizational Chart<br>• Interviews<br>Jail Administrator<br>PREA Coordinator<br><br>Through interviews with offenders and staff and review of offender and personnel files, review of facility and agency protocols and a facility tour, it is evident that this facility interweaves requirements of PREA in their daily protocols. Both offenders and staff could speak to facility PREA practices and protocols being used as is described in the agency’s Offender Sexual Abuse and Sexual Harassment Policy.<br><br>**HCSO, Policy 4D-22-8**<br>V. ZERO TOLERANCE OF SEXUAL ABUSE AND SEXUAL HARASSMENT; PREA |

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| | COORDINATOR 1. The Sheriff's Office shall provide information, monitor, and counsel offenders who have sexually aggressive behavior. The Sheriff's Office shall identify offenders who may be at risk for victimization. Health care services will be available to offenders involved in a sexual contact. 2. The Henrico Sheriff's Office has a zero-tolerance policy for all forms of sexual abuse/assault and sexual harassment and will ensure compliance with legal provisions regarding such activity. This policy is not intended to govern incident(s) of sexual assault/abuse by an offender against an employee, contractor, visitor, volunteer, or any other individual who has business with the Henrico Sheriff's Office CFR§115.11.<br><br>**Analysis/Reasoning**<br><br>The Auditor reviewed policies and procedures, organizational chart, and interviewed staff and offenders to verify the facility's level of compliance with this standard. The facility's zero tolerance policy outlines prevention, detection and response approaches towards sexual abuse and sexual harassment. Prevention efforts include architectural design, environmental controls, supervision strategies, offender movement practices, accessible and non-accessible facility areas, education efforts, and staff training.<br>Detection efforts include around the clock supervision, unannounced supervisory security rounds, staff prohibited from alerting other staff of supervisory security rounds, not relinquishing care and custody of offenders, requirements of documenting observations, staff prohibited from visiting other posts, encouraging offenders and requiring staff to report knowledge or suspicion of sexual abuse or sexual misconduct, and allowing staff to accept third party reports of allegations.<br>Response efforts include maintaining multiple ways for offenders to privately report allegations or retaliation, notifications of allegations to other agencies, protection methods, retaliation monitoring, investigating all allegations, reporting criminal acts of sexual abuse and sexual harassment to local law enforcement, notifying victims of investigative findings, conducting incident reviews, disciplinary action for abusers, and employing a PREA Coordinator and PREA Compliance Manager.<br><br>The captain's3 position is currently vacant. The PREA Coordinator position is currently being held by the Lieutenant of Investigations. Interviews with the PREA Compliance Manager reveal she feels she has sufficient time and authority to manage the facility's PREA efforts. The PREA Compliance Manager responded quickly and efficiently to all communications and requests from the auditor both before and during the audit.<br><br>Interviews with offenders reveal the facility has accomplished a zero-tolerance culture towards sexual abuse and sexual harassment. All offenders interviewed were knowledgeable in the facility's PREA prevention, detection, and response efforts. Offenders felt confident in staff's ability to respond to allegations of sexual abuse and sexual harassment. All offenders felt safe in the facility.<br><br>**Conclusion**<br><br>HCSO maintains an appropriate policy and has successfully created a zero-tolerance culture. The Auditor determined the facility meets the requirements of this standard |

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| | after a thorough review of policy and procedures, organizational chart, and interviewing staff and offenders. |

| 115.12 | Contracting with other entities for the confinement of inmates |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• HCSO Institutional PAQ<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, 05/2021<br>• Memorandum dated 05/15/2024<br>• Interviews:<br>PREA Manager<br>Jail Administrator<br><br>**HCSO Policy 4D-22-8**<br>Through contract and Memorandums of Understanding, any facilities or jails that contract for the confinement of Henrico County Sheriff’s Office offenders shall include the entity’s obligation to adopt and comply with the PREA standards. Any new contract, contract renewal or Memorandums of Understanding shall provide for agency contract monitoring to ensure that the contractor is complying with PREA standards. CFR§115.12<br><br>**Analysis/Reasoning**<br>The Henrico County Sheriff's Office- Regional Jail West does not contract with any other jurisdiction to house offenders for PREA. A copy of this memorandum will be placed in the PREA file for standard 115.12.<br><br>**Conclusion**<br>Through such reviews, the facility meets the standard requirements. |

| 115.13 | Supervision and monitoring |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Staffing Plan<br>• Unannounced Rounds |

Interviews:
1. Random Offenders
2. Targeted Offenders
3. Deputies
4. Lieutenant / Rounds
5. Jail Administrator

Interviews with the offenders and Deputies demonstrated opposite gender staff make cross-gender announcements were occurring at the beginning of each shift, upon a female reporting for duty to a unit and upon when entering a pod.

The interview with the Lieutenant demonstrated he conducts unannounced rounds every day by never going to the same pod at the same time and ensures he is seen on camera, completing rounds. In addition to completing rounds in each unit, and other areas of the facility, the Lieutenant stated he completes rounds on the yards and parking lots. Rounds are documented on unit narratives.

The interview with the Jail Administrator demonstrated she reviews the Staffing Plan Analysis annually in collaboration with the PREA Office. The Jail Administrator was aware the plan would be updated throughout the year should the facility complete any major modifications or when changes to post assignments took place.

**HCSO Policy 4D-22-8**

VI. SUPERVISION AND MONITORING CFR §115.13 1.

The Sheriff's Office shall ensure that each facility it operates shall develop, document, and make its best effort to comply on a regular basis with a staffing plan that provides adequate levels of staffing, and where applicable, video monitoring, to protect offenders against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility's physical plant (including "blind-spots" or areas where staff or offenders may be isolated: (6) The composition of the inmate population; (7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; (9) Any applicable State or local laws, regulations, or standards; (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) Any other relevant factors. 2. In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan. 3. Whenever necessary, but no less frequent than once each year, for each facility the agency operates, in consultation with the PREA Coordinator required by §115.11, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph 1 this section; (2) The facility's development of video monitoring systems and other monitoring technologies and (3) The resources the facility has available to commit to ensure adherence to the staffing plan. 4. The Sheriff's Office shall implement 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. Such policy and practices shall be implemented for night shifts as well as day shifts. Staff members are prohibited from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.

**Analysis/Reasoning**

The facility's staffing plan provides adequate levels of staffing to protect offenders from sexual abuse. The facility's cameras are strategically placed to assist in the prevention and detection of sexual abuse. The Auditor reviewed documentation submitted by the PREA Coordinator to the Jail Administrator notating her

review of the staffing plan. The document includes a consideration of all elements as required by PREA standard 115.13. During a tour of the facility the Auditor observed staff in all facility areas and observed camera placements.  Since August 20, 2012, or last PREA audit, whichever is later, there were (634) average daily number of offenders.  Since August 20, 2012, or last PREA audit, whichever is later, there were (634) average daily number of offenders on which the staffing plan was predicated.

**Conclusion:**

The Auditor concluded the facility has an adequate staffing plan to ensure the protection of offenders from sexual abuse. The staffing plan is reviewed in accordance with this standard. The Auditor reviewed policies, procedures, post audit, post audit review, Daily Duty Rosters, PREA Logbook, camera reports, interviewed staff and offenders and made observations to determine the facility meets the requirements of this standard.

| 115.14 | Youthful inmates |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Youthful Offenders 4-ALDF-2A-37 Thru 4-ALDF-2A-43 6VAC15-40-1190; 6VAC15-40-1193; 6VAC15-40-1195; 6VAC15-40-1200 CFR§115.14<br>Interviews:<br>Jail Administrator<br><br>Interviews with the Jail Administrator demonstrated youthful offenders were not housed at this facility.<br><br>**HCSO Policy 4D-22-8** |

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| | VIII. YOUTHFUL OFFENDERS CFR §115.14<br>The Henrico County Jail System is certified by the Virginia Department of Corrections to house adult females, adult males, and juveniles who have been certified as adults. However, to meet ACA standards, the Sheriff's Office does not house juvenile offenders that are certified as adults.<br>A youthful inmate shall not be placed in a housing unit in which the youthful inmate 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. (§115.14 [a], [b], [c])<br><br>Youthful Offenders 4-ALDF-2A-37 Thru 4-ALDF-2A-43 6VAC15-40-1190; 6VAC15-40-1193; 6VAC15-40-1195; 6VAC15-40-1200<br><br>VIII. YOUTHFUL OFFENDERS<br><br>The Henrico County Jail System is certified by the Virginia Department of Corrections to house adult females, adult males, and juveniles who have been certified as adults. However, to meet ACA standards, the Sheriff's Office does not house juvenile offenders that are certified as adults.<br><br>Site Observation:<br>The facility tour, formal and informal interviews with offenders and staff demonstrated youthful offenders were not housed at the facility.<br><br>(a) The Henrico County Sheriff's Office Institutional PAQ states the facility prohibits placing youthful offenders in a housing unit in which a youthful offender will have sight, sound, or physical contact with any adult offenders through use of a shared dayroom or other common space, shower area, or sleeping quarters. The facility does not house youthful offenders.<br><br>Through such reviews, the facility meets the standard requirements. |

| **115.15** | **Limits to cross-gender viewing and searches** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 2C-01, Contraband, effective date May 2021<br>• Henrico County Sheriff's Office, Control (Security Checks and Inspections) 4-ALDF-2A-05 (Revised August 2010) 6VAC15-40-880; 6VAC15-40- 1040; 6VAC15-40-1045, May 2021<br>• Lesson Plan<br>• Training Attendance Rosters<br>Interviews:<br>Random Offenders |

Targeted Offenders
Deputies
Facility Compliance Manager
Jail Administrator

Interviews with (13) targeted and (17) random offenders demonstrated a large percentage believed the search procedures to be conducted respectfully by staff. Offenders stated most female staff announce their presence when entering their dorms and the facility makes an announcement at the beginning of each shift over the intercom. Interviews with female Deputies demonstrated each had been trained in cross gender pat searches and the facility does not provide the option for females to strip search transgender offenders. The interview with the Jail Administrator demonstrated offenders are always searched by two Deputies.

HCSO Policy 2C-01

It is the policy of Henrico County Sheriff's Office that no male staff member will conduct cross gender searches of a female inmate.

B. CROSS-GENDER SEARCHES
Cross-gender viewing and search are prohibited except in exigent circumstances or when performed by medical practitioners. All cross-gender strip searches and cross gender visual body cavity searches shall be documented on an incident report that outlines the exigent circumstances. CFR§115.15 2. All offenders can shower and perform bodily functions and change clothing without nonmedical staff of the opposite gender viewing their breast, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. 3. The facility shall not search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. If the detainee's genital status is unknown, it may be determined during conversations with the detainee, by reviewing medical records, or, if necessary, by learning that the information as part of a broader medical examination conducted in private by a medical practitioner. 4. The agency shall train all sworn staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

HCSO Security Checks and Inspections Security Checks and Inspections

Staff members of the opposite gender must announce their presence when entering an inmate housing area.

**Analysis/Reasoning**

There were (0) number of pat-down searches of female offenders that were conducted by male staff. There were (0) number of pat-down searches of female offenders conducted by male staff that did not involve exigent circumstance(s). One hundred (100%) of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex offenders in a professional and respectful manner, consistent with security needs.

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| | The HCSO does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances. The HCSO conducts searches of transgender and intersex offenders, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.<br><br>The HCSO has policies and procedures that enable offenders 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. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. Policy and observations show that officers of the same gender as the offenders are assigned tower posts that are adjacent to restrooms and shower areas. Thus, offenders are not viewed by officers of the opposite gender while using the toilets and showers.<br><br>**Conclusion**<br><br>The HCSO does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard. |

| **115.16** | **Inmates with disabilities and inmates who are limited English proficient** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, May 2021<br>• Certified Language International<br>• PREA Offender Handout<br>• Language Line Information<br>• Brochure Sexual Misconduct/Sexual Harassment English and Spanish<br>• Sworn Jail West-PREA Training<br>Interviews:<br>1. Targeted Offenders<br>2. Intake Officer<br><br>Interviews with four (4) LEP offenders demonstrated each had been educated on |

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| | PREA during the intake process, signed PREA training documentation in their own language and were aware of PREA information posted on bulletin boards.<br><br>The interview with the Intake Staff demonstrated offenders are educated on PREA, the agency zero tolerance policy, their rights, and reporting information the day they arrive to the facility through the End the Silence brochure. The Intake Staff also stated offenders sign PREA Education Acknowledgements at the time the education is delivered.<br><br>**HCSO Policy 4D-22-8**<br><br>The Sheriff's office will not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first response duties under §115.64, or the investigation of the inmate's allegation. The sheriff's office utilizes an interpretation service that is available 24 hours a day for assistance with any non-English speaking offenders. CFR§115.16<br><br>**Analysis/Reasoning**<br><br>HCSO ensures offenders with disabilities and who are limited English proficient have access to PREA information and programs. Henrico County Sheriff's Office has taken appropriate steps to ensure that offenders who are limited English proficient or disabled 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.<br><br>The auditor used the language line that provides foreign language translation to the jail for one of the inmate interviews. PREA handouts and inmate handbooks are in English and Spanish. English and Spanish PREA posters are posted throughout the institution. Staff and offenders interviewed stated offenders are not used as interpreters when addressing sexual abuse and sexual harassment allegations. The Jail has a Telecommunication Devise for Deaf People (TDD) available for offenders who are hearing impaired. For offenders with a mental disability, staff spends time to ensure they understand the PREA basics of definitions and reporting.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the agency's policies, procedures, Offender Handbook, Zero Tolerance for Sexual Abuse and Sexual Harassment handout, comprehensive educational video, interpretive services contracts, offender records, training records, conducted interviews with staff, offenders and made observations to determine the agency meets the requirements of this standard. |

| **115.17** | **Hiring and promotion decisions** |
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| | **Auditor Overall Determination:** Meets Standard |

**Auditor Discussion**

**Policy, Materials, Interviews and Other Evidence Reviewed**

• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, May 2021
• Employee Personnel Files
• Contractors

Interviews:

1. Human Resource Officer

The interview with the Human Resource Officer demonstrated all applicants and contractors complete criminal history background checks upon hiring, promotion and or when contracting for services. Administrative adjudication questions are completed during hiring, interview, and promotional processes. Institutional reference checks are completed for each applicable applicant and institutional reference check information is provided to employers for past employees.

**HCSO Policy 4D-22-8**

VII. HIRING AND PROMOTION DECISIONS CFR §115.17
1. The Sheriff’s Office shall not hire or promote anyone who may have contact with offenders, and shall not enlist the services of any contractor who may have contact with offenders, who—
a. 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);
b. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or
c. Has been civilly or administratively adjudicated to have engaged in the activity described in section (b.) of this section.

2. The Sheriff’s Office 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 offenders.
3. Before hiring new employees who may have contact with offenders, the agency shall:
a. Perform a criminal background records check; and
b. 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.
4. 115.17(d) The Sheriff’s Office shall perform a criminal background record check before enlisting the services of any contractor who may have contact with offenders.
5. 115.17(e) The Sheriff’s Office will conduct criminal background records checks at least every five years of current employees and annually for contractors that have contact with offenders.
6. The Sheriff’s Office will ask all applicants and employees who may have contact with offenders directly about previous misconduct described in paragraph (1) of this

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| | section in written applications or interviews for hiring or promotions and as a part of the review of current employees. The Sheriff's Office requires that instances of misconduct by employees be reported to Internal Affairs immediately— Material omissions regarding such misconduct, or provisions of materially false information, shall be grounds for termination.<br>7. Unless prohibited by law, the Sheriff's Office will 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.<br><br>**Analysis/Reasoning**<br><br>The Auditor reviewed records which show current staff have received a criminal history background check. The Auditor randomly selected current staff members and specialized staff. The files reveal all have had a criminal background check. HCSO does not hire or promote anyone who may have contact with offenders, and does not enlist the services of any contractor who may have contact with offenders, who has engaged in sexual abuse in any criminal justice facility, 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 has been civilly or administratively adjudicated to have engaged in the activity described above.<br><br>HCSO considers 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 offenders. HCSO performs a criminal background record check before enlisting the services of any contractor who may have contact with offenders and performs records check at least every five years of current employees and contractors who may have contact with offenders.<br><br>**Conclusion:**<br><br>In the past 12 months, there was (7) number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with offenders. In the past 12 months, there were (110) number of persons hired who may have contact with offenders who have had criminal background record checks.<br><br>The Auditor concluded the HCSO is performing appropriate practices to identify previous acts of sexual misconduct prior to hiring staff and enlisting the services of contractors, and before promoting staff members. The Auditor conducted a thorough review of the agency's policies, procedures, employee records, contractor records, Background Investigation Questionnaire, Confidential Summary Background Investigation Report, Employment Application, Employee Self-Assessment, Criminal History Background Check Tracking, and interviewed staff and contractors to determine the agency meets the requirements of this standard. |

| 115.18 | Upgrades to facilities and technologies |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | Document Review:<br>• Henrico County Sheriff’s Office Authority Institutional PAQ<br><br>Interviews:<br>1. Jail Administrator<br>2. Interviews with facility Jail Administrator demonstrated the facility has not acquired a new facility or made substantial expansions since the last PREA Audit.<br><br>The HCSO PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.<br><br>Proposal to Upgrade Standard Definition Cameras to HD Cameras and Card Access System to new Enterprise level Software and CAC Readers at Henrico Jails East & West per attached schedules. System Galaxy Software is quoted under separate proposal.<br>Video System Equipment<br>AXIS Q9216-SLV 4MP Corner Mounted Impact-Resistant Fixed Dome IR WDR IP Camera, 2.4mm Lens<br>AXIS P3265-LV P32 Series 2MP Indoor Fixed LED WDR IP Dome Camera, 3.4-8.9mm Varifocal Lens, White<br>AXIS M4318-PLVE 12MP Outdoor IR Panoramic Mini Dome IP Camera, 1.3mm Fixed Lens, White<br>AXIS P3267-LVE P32 Series 5MP Outdoor Vandal Resistant Fixed Dome IR WDR IP Camera, 3-Smm Varifocal Lens, White<br>Access Control Equipment<br>R40 Standard wall switch reader; OSDP; No Prox; Mobile IDs via NFC and Bluetooth Smart; iCLASS Seos, SE, SR, Standard; MIFARE Classic (SIO), MIFARE DESFire EVl (SIO); ISO 14443 UID; Mobile enabled;<br><br>Through such reviews, the facility meets the standard requirements. |

| 115.21 | Evidence protocol and forensic medical examinations |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, May 2021<br>• Investigations/Internal Affairs Sexual Assault Response Guide |

- Medical Services Sexual Assault Response Checklist
- MOU with The Henrico County Police Division
- MOU with St. Mary’s Hospital
- MOU with YWCA Safe Harbor
- Henrico Sheriff's Office Health Services Policy and Procedure Manual
- Interview with Medical Staff

The interview with the Facility Health Service Administrator demonstrated he is aware of signs and symptoms of sexual abuse and would immediately report allegations to the Officer in Charge and make arrangements to send offenders to the YWCA/Safe Harbor, Forensic Nurse Examiners at St. Mary’s Hospital.

**HCSO Policy 4D-22-8 Policy PREA**

XVIII. EVIDENCE PROTOCOL AND FORENSIC MEDICAL EXAMINATIONS CFR§115.21
1. To the extent the Sheriff’s Office is responsible for investigating allegations of sexual abuse, the Sheriff’s Office shall follow uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

2. The Sheriff’s Office shall offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The Sheriff’s Office shall document its efforts to provide SAFEs or SANEs. The Sheriff’s Office has a memorandum of understanding with St. Mary’s Hospital for these services. The Sheriff’s Office will contact St. Mary’s Hospital if the allegation of sexual abuse is outside of 72 hours and within 120 hours of the alleged abuse for direction of the Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) if the victim needs to be transported to St. Mary’s for a forensic examination.

3. The Sheriff’s Office shall attempt to make available to the victim a victim advocate from a rape crisis center. The Sheriff’s Office has an MOU with the YWCA of Richmond for victim advocate services. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services from rape crisis centers. For the purpose standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages.

4. As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

**Analysis/Reasoning**

To the extent HCSO is responsible for investigating allegations of sexual abuse; HCSO

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| | follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions HCSO offers all victims of sexual abuse access to forensic medical examinations, at St. Mary's Hospital, without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible.<br><br>There were (4) number of forensic medical exams conducted during the past 12 months. There (4) number of exams performed by SANEs/SAFEs during the past 12 months. There were (0) number of exams performed by a qualified medical practitioner during the past 12 months.<br><br>HCSO makes available to the victim a victim advocate from the YWCA. As requested by the victim, a victim advocate accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals. To the extent HCSO itself is not responsible for investigating allegations of sexual abuse, HCSO requests that the investigating agency follow the requirements listed above. HCSO conducts all investigation once they are deemed criminal, based on the preponderance of the evidence.<br><br>**Conclusion**<br><br>The Auditor determined the facility meets the requirements of this standard. |

| **115.22** | **Policies to ensure referrals of allegations for investigations** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures, May 2021<br>• MOU with The Henrico County Police Division (J-G-09)<br>• HCSO Website<br>• Investigative Log<br><br>Interviews:<br>1. Deputies<br>2. Investigator<br><br>Staff interviews demonstrated each would immediately report any information regarding sexual harassment and sexual abuse to their immediate supervisor, or the Officer in Charge.<br><br>The interview with the Investigator demonstrated each allegation of sexual |

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| | harassment or sexual abuse would be investigated regardless of the source of the allegation.<br><br>**HCSO Policy 4D-22-8**<br>XVI. SEXUAL ABUSE/ASSAULT RESPONSE<br>1. The Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. CFR §115.22<br><br>h. The Sheriff can refer allegations of sexual abuse or sexual harassment to an outside agency with the legal authority to conduct criminal investigations when the allegation involves potentially criminal activity. CFR§115.22<br><br>**Analysis/Reasoning**<br><br>The Auditor reviewed the facility's website. The facility has included its procedures for referring criminal allegations of sexual harassment and sexual abuse to the Henrico County Sheriff's Office on the HCSO website. The website outlines the responsibilities of the HCSO during administrative investigations and criminal investigations of sexual harassment and sexual abuse.<br><br>During the past 12 months, there were (38) allegations of sexual assault and sexual harassment that were received. The facility reported zero (21) allegations for administrative investigation and (0) criminal investigation during the past 12 months.<br><br>The investigator informed the Auditor she contacts the sheriff's office to make referrals when the evidence supports criminal prosecution. The investigator stated she investigates all allegations of sexual abuse and sexual harassment.<br><br>**Conclusion**<br><br>The Auditor determined the facility meets the requirements of this standard after reviewing policy and procedures, facility website, investigative files and interviewing the facility investigator. |

| **115.31** | **Employee training** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Civilian Training Pamphlet<br>• Training Curriculum<br>• Lesson Plans<br>• Training Rosters<br>• Training Records |

Interviews:
1. Officers

Interviews with Officers demonstrated each were aware of and received initial, annual and refresher PREA training. Officers stated training is delivered to them once a year through in-person in-service training, the learning management system and through their supervisors throughout the year.

**HCSO Policy 4D-22-8**

1. STAFF TRAINING CFR §115.31 & CFR §115.32
a. The Sheriff's Office shall train all employees, volunteers and contractual staff who may have contact with offenders on the following:
(1) §The Sheriff's Office zero-tolerance for sexual abuse and sexual harassment;
(2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
(3) Offenders' right to be free from sexual abuse and sexual harassment;
(4) The right of offenders and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
(5) The dynamics of sexual abuse and sexual harassment in confinement;
(6) The common reaction of sexual abuse and sexual harassment victims;
(7) How to detect and respond to signs of threatened and actual sexual abuse;
(8) How to avoid inappropriate relationships with offenders;
(9) How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders, and
(10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
(11) All security staff will be trained in how to properly pat-down searches transgender offenders.
(12) All staff will have received In-Service training every two years along with Refresher Training every year.
(13) 115.31 (c) All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards.

**Analysis/Reasoning**

A review of the staff training documentation including staff training rosters, and staff interviews confirmed all sworn staff receives PREA training during basic academy training and refresher PREA training throughout the year during briefing. All civilian employees receive PREA training during orientation in addition to receiving refresher PREA training throughout the year.

All employees have to acknowledge that they understand the training they received. Upon review of the lesson plan for Henrico County Sheriff's Office, it was confirmed the training provided to staff included zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill
their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; Offenders' right to be free from sexual abuse and sexual harassment; The right of offenders and employees to

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| | be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with offenders; How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders: and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.<br><br>Staff interviews confirmed staff receive continuous training, their comprehension of the PREA training and their obligation to report any allegation of the sexual abuse and/or sexual harassment. At the facility, it was evident through documentation, interviews, and observation of the day-to-day operations that the staff is trained continually about the PREA standards during shift briefings and the completion of various on-line training. Staff interviews confirmed staff receive continuous training, their comprehension of the PREA training and their obligation to report any allegation of the sexual abuse and/or sexual harassment. At the facility, it was evident through documentation, interviews, and observation of the day-to-day operations that the staff is trained continually about the PREA standards during shift briefings and the completion of various on-line training.<br><br>**Conclusion**<br><br>The Auditor reviewed documentation showing staff have received training as required by this standard. The Auditor reviewed policy and procedures, training documents and materials, and interviewed staff to determine the facility meets the requirements of this standard. |

| **115.32** | **Volunteer and contractor training** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Contractor Training Curriculum PowerPoint<br>• Volunteer/Contractor Training Documents<br>• Volunteer/Contractor Handbook<br>Interviews:<br>1. Contractor<br>2. Volunteer<br><br>The interview with the contractor and the volunteer demonstrated each have completed mandatory in person training on the agency zero tolerance for sexual harassment and sexual abuse. Each was able to convey they were taught to report to the nearest staff member or an immediate supervisor, do their best to maintain |

confidentiality and keep the victim near them, if possible and write a statement once the situation was safe to do so.

**HCSO Policy 4D-22-8**
STAFF TRAINING CFR §115.31 & CFR §115.32
a. The Sheriff's Office shall train all employees, volunteers and contractual staff who may have contact with inmates on the following:
(1) §The Sheriff's Office zero-tolerance for sexual abuse and sexual harassment;
(2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
(3) Inmates' right to be free from sexual abuse and sexual harassment;
(4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
(5) The dynamics of sexual abuse and sexual harassment in confinement;
(6) The common reaction of sexual abuse and sexual harassment victims;
(7) How to detect and respond to signs of threatened and actual sexual abuse;
(8) How to avoid inappropriate relationships with inmates;
(9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates, and
(10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
(11) All security staff will be trained in how to properly pat-down searches transgender inmates.
(12) All staff will have received In-Service training every two years along with Refresher Training every year.

c. During orientation, volunteers, contractors and any other individuals that will have direct offender contact must receive information regarding sexual abuse/assault and the potential consequences for engaging in such behavior with offenders during security training.CFR§115.32

d. CFR§115.32 (b) 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, but all volunteers and contractors who have contact with inmates shall be notified of the agency's zero-tolerance
policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

**Analysis/Reasoning**

The Auditor reviewed training documents which show contractors have been trained on their responsibilities under the jail's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Each volunteer and contractor are issued a handbook which includes the facility's zero tolerance policy, reporting mechanisms, documenting allegations, appropriate response as a volunteer or contractor and disciplinary policies. All volunteers and contractors sign a statement denoting, "By signing this I acknowledge that I have completed and understand the training and have also read and understand HCSO Policy 4D-22-8 on Prison Rape

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| | Elimination Act.” The facility currently has (156) volunteers/contractors. The Auditor requested the training documents of both and verified each had received the training.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of volunteer and contractor training records. The Auditor conducted formal interviews with contractors, reviewed facility policy and procedures, Volunteer/Contractor Handbook, and volunteer and contractor training curriculum. After reviewing the documentation and interviewing contractors the Auditor determined the HCSO meets the requirements of this standard. |

| **115.33** | **Inmate education** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• PREA Informational Sheet<br>• Education Video<br>• Inmate Records<br>Interviews:<br>1. Random Offenders<br>2. Targeted Offenders<br>3. Intake Staff<br><br>Interviews with (13) random and (17) targeted offenders demonstrated they were educated on PREA during the orientation process, typically within one to three days of entering the facility. Offenders were aware of their rights, the agency’s zero tolerance policy and multiple internal and external reporting options.<br><br>**HCSO Policy 4D-22-8**<br>Inmate Education CFR§115.33<br><br>a. During the intake process, staff shall inform offenders of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.<br>b. Within 30 days of intake, the agency shall provide comprehensive education to offenders via video and written materials regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such abuse or harassment.<br>c. The Sheriff’s Office shall take appropriate steps to ensure that offenders with disabilities (including, for example, inmate who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of |

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| | the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment.<br><br>The Sheriff’s office will not rely on inmate interpreters, inmate readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate’s safety, the performance of first response duties under §115.64, or the investigation of the inmate’s allegation. The sheriff’s office utilizes an interpretation service that is available 24 hours a day for assistance with any non-English speaking inmates. CFR§115.16<br><br>**Analysis/Reasoning**<br><br>The Auditor reviewed documentation provided by the facility which shows offenders had received information during the booking process and comprehensive education within 30 days of arriving at the facility. The Auditor interviewed staff members who work in the intake section. Staff informed the Auditor each offender receives an informational sheet when arriving in intake. The booking officer discusses the PREA informational sheet with each offender then receives the offender’s signature on the sheet. Booking Officers informed they play the PREA comprehensive educational video during the booking process.<br><br>There were (12665) number of offenders admitted during past 12 months who were given this information at intake.  There were (1952) number of those offenders during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse/ harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake.<br><br>The Auditor conducted interviews with offenders. Each offender was asked questions related to the educational material provided by the facility. Each offender was able to articulate answers to the Auditor’s questions which revealed they had received PREA information and education. All offenders knew how to report allegations of sexual assault, sexual harassment and/or retaliation for reporting such incidents. The offender population was fully aware of the facility’s zero tolerance policy towards sexual abuse and sexual harassment. Offenders had been made aware of their right to be free from sexual abuse, sexual harassment and retaliation, and the facility’s policies for responding to such incidents.<br><br>**Conclusion**<br><br>The Auditor determined the facility meets the requirements of this standard. |

| **115.34** | **Specialized training: Investigations** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |

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| | Policy, Materials, Interviews and Other Evidence Reviewed<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Investigator’s Training Records<br>• Training Curriculum (NIC website)<br>Interviews:<br>1. Investigator<br><br>Interviews with the Investigator and personnel file review demonstrated that the investigator had completed investigator training through the learning management system and in person.<br><br>**HCSO Policy 4D-22-8**<br><br>Investigation<br>b. Investigators assigned to conducting sexual abuse investigations will receive specialized training in the following areas CFR §115.34<br><br>**Analysis/Reasoning**<br><br>In addition to the general training provided to all employees HCSO ensures that the in-house investigator has received training in conducting investigations in confinement settings. Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. HCSO maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. There were (6) number of investigators currently employed who have completed the required training.<br><br>**Conclusion**<br><br>After a thorough review of training records, training curriculum and an interview with the facility investigator the Auditor determined the investigator has been appropriately trained and the facility meets the requirements of this standard. |

| **115.35** | **Specialized training: Medical and mental health care** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Training Curriculum<br>• Medical Staff Training Records<br><br>Interviews:<br>1. Nurse Supervisor |

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| | 2. Mental Health Staff<br><br>Interviews with medical and mental health staff demonstrated they themselves and their staff had completed specialized training for medical and mental health staff through the online learning management system, throughout the year. Medical and mental health staff interviewed stated newly hired personnel complete specialized training during the onboarding training.<br><br>**HCSO Policy 4D-22-8**<br><br>Specialized Training for Medical and Mental Health Care Staff CFR§115.35<br>a. All full and part-time medical and mental health care practitioners who work regularly in the facility will be trained in:<br>1. How to detect and assess signs of sexual abuse<br>2. How to preserve physical evidence of sexual abuse<br>3. How to respond effectively and professionally to victims of sexual abuse and<br>4. How and to whom to report allegations or suspicions of sexual abuse.<br><br>b. The agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this policy from the agency or elsewhere.<br><br>**Analysis/ Reasoning**<br><br>HCSO ensures that all full and part-time medical and mental health care practitioners who work regularly have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.<br><br>There are (50) number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy. One Hundred percent (100%) percent of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy.<br><br>**Conclusion**<br><br>HCSO maintains documentation that medical and mental health practitioners have received the training. Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers. |

| **115.41** | **Screening for risk of victimization and abusiveness** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |

**Policy, Materials, Interviews and Other Evidence Reviewed**

• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures
• Henrico County Sheriff's Office, 4-ALDF-2A-25 (Ref. 3-ALDF-4A-01) 6VAC15-40-120, Classification Custody Level Criterion
• PREA Initial Assessment – Short and Long Form
• PREA Re - Assessment

Interviews:

1. Random Offenders
2. Targeted Offenders
3. Classification Staff

Interviews with offenders demonstrated many offenders remembered being asked risk screening questions.

Interviews with the Classification Staff demonstrated each completes risk assessment for each offender admitted to the facility, within 24 hours and again within 15-30 days of intake. Classification Staff stated assessments are completed in a private area, one on one with offenders. During risk screenings, Classification Staff consider offender behavior, education, family background, past sexual victimization, and how each offender identifies sexually.

**HCSO Policy 4D-22-8**

XI. SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS CFR§115.41
1. All inmates shall be assessed during intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.
2. Intake screening shall ordinarily take place within 72 hours of arrival at the facility.
3. Such assessments shall be conducted using an objective screening instrument.
4. The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization:
a. Whether the inmate has a mental, physical, or developmental disability;
b. The age of the inmate;
c. The physical build of the inmate;
d. Whether the inmate has previously been incarcerated;
e. Whether the inmate's criminal history is exclusively nonviolent;
f. Whether the inmate has prior convictions for sex offenses against an adult or child;
g. Whether the inmate is or is not perceived to be gay, lesbian, bisexual, transgender, intersex,
or gender conforming;
h. Whether the inmate has previously experienced sexual victimization;
i. The inmate's own perception of vulnerability; and
j. Whether the inmate is detained solely for civil immigration purposes.

**HCSO Classification Custody Level Criterion**

G. Screening for Risk of Sexual Victimization and Abusiveness §115.41 (a) All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. (b) Intake screening shall ordinarily take place within 72 hours of arrival at

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| | the facility. (c) Such assessments shall be conducted using an objective screening instrument. (d) The intake screening shall 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. 2. The age of the inmate. 3. The physical build of the inmate. 4. Whether the inmate has previously been incarcerated. 5. Whether the inmate's criminal history is exclusively nonviolent. 6. Whether the inmate has prior convictions for sex offenses against an adult or child. 7. Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming. 8. Whether the inmate has previously experienced sexual victimization. 9. The inmate's own perception of vulnerability; and 10. Whether the inmate is detained solely for civil immigration purpose. (e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive. (f) Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional relevant information received by the facility since the intake screening. (g) An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. (h) Inmates may not be discipline 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. (i) The agency shall implement 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.<br><br>**Analysis/Reasoning**<br><br>The Auditor reviewed the Custody Level Criterion utilized during the intake screening. The intake screening occurs in an office in a private setting away from other offenders. All questions are asked by the Classification Officer. The Custody Level Criterion includes the following considerations listed above.<br><br>There were (3686) number of offenders entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other offenders within 72 hours of their entry into the facility.<br><br>There were (1952) number of offenders entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake.<br><br>**Conclusion**<br><br>The Auditor determined the facility is appropriately screening offenders for their risk of victimization and abusiveness. The Auditor determined the facility meets the requirements of this standard. |

| 115.42 | Use of screening information |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Henrico County Sheriff’s Office, 4-ALDF-2A-25 (Ref. 3-ALDF-4A-01) 6VAC15-40-120, Classification Custody Level Criterion<br>• Henrico County Sheriff’s Office, Policy 4D22 Risk Information<br>• PREA Reporting Abusive/Victimization<br>• Classification Records<br>Interviews:<br>1. Targeted Offenders<br>2. Facility Compliance Specialist / PREA Compliance Manager<br>3. Jail Administrator<br>4. PREA Coordinator<br>5. PREA Director / Head of Agency<br><br>Interviews with two (2) transgender inmates and one (1) inmate who identify as gay, or bisexual, each believed they were housed appropriately and in with a good mix of other offenders. The interview with the Intake Deputy demonstrated offenders at risk of victimization and or abusiveness are placed in high visibility bunks, in the front of the dorm and near cameras.<br><br>**HCSO Policy 4D-22-8**<br><br>XII. USE OF SCREENING INFORMATION CFR§115.42<br>1. The agency shall use information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.<br>2. The agency shall make individualized determinations about how to ensure the safety of each inmate.<br>3. In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate’s health and safety, and whether the placement would present management or security problems.<br>4. A transgender or intersex inmate’s own views with respect to his or her own safety shall be given serious consideration.<br>5. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.<br>6. The Sheriff’s Office 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 established in connection with a consent decree, |

legal settlement, or legal judgment for the purpose of protecting such inmates.
7. Facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. CFR§115.15

**HCSO Classification Custody Level Criterion**

H. Use of Screening Information §115.42 (a) The agency shall use information from this risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. (b) The agency shall make individualized determinations about how to ensure the safety of each inmate. (c) In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. (d) Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate. (e) A transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. (f) Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates. (g) The agency 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 established in connection with a consent decree, legal statement, or legal judgment for the purpose of protecting such inmates.

**Policy 4D22 Risk Information Policy 4D22 Risk Information**
XII. USE OF SCREENING INFORMATION CFR§115.42

1. The agency shall use information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.
2. The agency shall make individualized determinations about how to ensure the safety of each inmate.
3. In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would placement would present management or security problems.
4. own view with respect to his or her own safety shall be given serious consideration.
5. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.
6. 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 established in connection with a consent decree, legal settlement, or legal judgment

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| | for the purpose of protecting such inmates.<br>7. programming or other out-of-cell opportunities in order to comply with this provision. CFR§115.15<br><br>**Analysis/Reasoning**<br><br>The HCSO policy stipulates information from the objective risk screening instrument will be utilized to determine housing, bed, work, education, and programming assignments to prevent offenders who are determined at high risk of sexual victimization from being placed with those at risk of being sexually abusive. Jail staff are required to make individualized determinations to ensure the safety of each offender. Individualized determinations must also be made for transgender and intersex offenders and their own views with respect to their own safety must be taken into consideration when determining housing, bed, educational and programming assignments.<br><br>Policy requires staff to consider transgender and intersex assignments to male or female living units on a case-by-case basis based on the health and safety of the offender and the security needs of the HCSO. The facility policy stipulates transgender and intersex offenders can shower separately from other offenders. The HCSO prohibits placing lesbian, gay, bisexual, transgender, or intersex offenders in dedicated units based solely on their identification or status unless in conjunction with a consent decree, legal settlement, or legal judgement for the purpose of protecting such offender.<br><br>The Auditor conducted a thorough tour of the HCSO. During the tour all offender living areas were visited. Each living unit allows transgender offenders the opportunity to shower separately from other offenders as each shower in the facility has a shower curtain. The Auditor conducted interviews with randomly selected offenders.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility’s policy and procedures, classification records, and conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.43** | **Protective Custody** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Memorandum (HCSO did not experience any incidents of inmates being involuntarily segregated due to them being at high risk for sexual victimization.) |

Interviews:
1. Intake Officer

The interview with the Intake Deputy demonstrated if victims of sexual abuse are held in restrictive housing they are allotted limited privileges as they cannot go to work or attend programming; however, education is brought to them when possible, phone calls are allowed the Intake Deputy stated program staff meet with them every 15 days and document their conversations in the Offender individual notes in the database, to include reasons the offender may need to continue their stay in restricted housing.

**HCSO Policy 4D-22-8,**

XIII. PROTECTIVE CUSTODY CFR §115.43

1. Inmates at high risk of 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 less than 24 hours while completing the assessment.

2. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:
a. The opportunities that have been limited;
b. The duration of the limitation; and
c. The reasons for such limitations.

3. 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.

4. If an involuntary segregated housing assignment is made pursuant to paragraph (1) of this section, the facility shall clearly document:
a. The basis for the facility's concern for the inmate's safety; and
b. The reason why no alternative means of separation can be arranged.

5. Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

**Analysis/Reasoning**

Offenders at high risk for sexual victimization are not 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. Offenders placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If HCSO restricts access to programs, privileges, education, or

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| | work opportunities, HCSO documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.<br><br>HCSO assigns such offenders to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceeding a period of 30 days. If involuntary segregated housing assignment is made HCSO clearly documents the basis for HCSO's, concern for the offender's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.<br><br>The number of offenders at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment (0). The number of offenders at risk of sexual victimization who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement (0). From a review of case files of offenders at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facility's concern for the offender's safety, and (b) the reason or reasons why alternative means of separation could not be arranged (0).<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility's policy and procedures, classification records, and conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.51** | **Inmate reporting** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Inmate Grievance forms for Sexual Abuse/Assault English/Spanish<br><br>• Investigative Reports<br>• Offender Request Form<br>• Memorandum (HSCO did not experience any incidents of anonymous reporting of sexual assaults or sexual harassment of inmates.)<br>• MOU with YWCA Safe Harbor and Henrico County Sheriff's Office Authority<br>• Inmate Handbook English/Spanish<br>Interviews:<br>1. Random Offenders<br>2. Targeted Offenders |

3. Officers
4. Mailroom Staff

Interviews with targeted and random offenders demonstrated they were aware of reporting options to include the PREA hotline. Many offenders commented on the signs with hotline numbers posted above their phones.

Interviews with Officers demonstrated they would accept and report any type of allegation received, heard, or rumored regarding sexual harassment and sexual abuse to their immediate supervisors or up the chain of command.

**HCSO Policy 4D-22-8**

3. The Sheriff's Office shall provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. The Henrico Sheriff's Office allows inmates reporting sexual abuse or sexual harassment to remain anonymous upon request. CFR§115.51

a. An inmate who is a victim of sexual assault, sexual abuse, or threatened with sexual activity may request that a particular staff member be made available to receive their information in addition to reporting the assault via the PREA hotline using the inmate telephone system. For anonymity purpose staff may report sexual abuse and sexual harassment of inmates by utilizing the PREA hotline by calling 501-5568. In addition to the PREA hotline, the YWCA of Richmond (804) 612-6126 and the National Sexual Abuse Hotline 1-(800)-656-4673 are outside resources that can be used for reporting purposes.
b. The Shift Supervisor shall order the inmate re-assigned to administrative segregation status until reviewed by Classification.
c. All completed checklists will be forwarded to the Supervisor of Investigations for further investigation and consultation with the Commonwealth Attorney Office's to determine if there is sufficient evidence to pursue criminal charges.

**Analysis/Reasoning**

The offenders have a hotline they can call that is forwarded directly to the YWCA Sexual Assault Response Program. Based on interviews with random staff, offenders, and review of the Memorandum of Understanding with the YWCA Sexual Assault Response Program.

HCSO provides multiple internal ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmate request forms have how to report sexual abuse and the hotline number posted in close proximity to phones in the inmate housing units as a constant reminder.

HCSO provides at least one way for offenders to report abuse or harassment to the

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| | YWCA Safe Harbor., a private entity that is not part of HCSO and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Staff accept reports made verbally, in writing, anonymously, and from third parties and promptly documents any verbal reports. HCSO provides a hotline for offenders to privately report sexual abuse and sexual harassment of offenders.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.52** | **Exhaustion of administrative remedies** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Henrico County Sheriff's Office Policy 6B-01 Grievance Procedure<br>• Inmate Handbook English/Spanish<br><br>Interviews:<br>1. Random Offenders<br>2. Targeted Offenders<br>3. PREA Coordinator / PREA Compliance Manager<br><br>Interviews with offenders demonstrated most were aware of the grievance procedures, stating grievances are available upon request to an officer and none had a hard time obtaining them.<br><br>The interview with the PREA Compliance Manager demonstrated grievance boxes are checked five days a week by herself or Secretaries.<br><br>**HCSO Policy 4D-22-8**<br><br>4. The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. CFR §115.52<br>5. The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.<br>6. The agency shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.<br>7. Nothing in this section shall restrict the agency's ability to defend against an inmate lawsuit on the ground that the applicable statute of limitations has expired.<br>8. 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, the inmate may consider the absence of a response to be a denial at that level.

**HCSO Policy 6B-01 Grievance Procedures**

I. Grievance Procedure Regarding Sexual Abuse/Assault CFR§115.52

1. There shall be no time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.
2. PREA Coordinator will ensure the following:
a. The inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
b. Such grievance is not referred to a staff member who is the subject of the complaint. c. The Sexual Abuse Incident Review Team shall submit for review by the Sheriff or his designee a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filling of the grievance.
d. Computation of the 90-day time period shall not include time consumed by inmates in preparing any administrative appeal.
e. The Sexual Abuse Incident Review Team may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The PREA Manager shall notify the inmate in writing of any such extension and provide a date by which a decision will be made.
f. Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing request for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of the inmates.
g. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate’s decision.
h. In cases where there is a substantial risk of imminent sexual abuse, an inmate may file an emergency grievance after which the inmate will be relocated immediately.
i. After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance any portion thereof that alleges the substantial risk of imminent sexual abuse) to the PREA manager who will forward the report for immediate corrective actions. The initial response shall be provided within 48 hours, and the final decision within 5 calendar days. The initial response and the final agency decision shall document the agency’s determination whether the inmate is in substantial risk of imminent sexual abuse and the action take n in response to the emergency grievance.
j. The agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

**Analysis/Reasoning**

The offender who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not

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| | referred to a staff member who is the subject of the complaint. The Sexual Abuse Incident Review Team shall submit for review by the Sheriff or his designee a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filling of the grievance.<br><br>Computation of the 90-day time period shall not include time consumed by offenders in preparing any administrative appeal. The Sexual Abuse Incident Review Team may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The PREA Manager shall notify the offender in writing of any such extension and provide a date by which a decision will be made. Third parties, including fellow offenders, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders in filing request for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on<br>behalf of the offenders. If the offender declines to have the request processed on his or her behalf, the agency shall document the offender's decision. In cases where there is a substantial risk of imminent sexual abuse, an offender may file an emergency grievance after which the offender will be relocated immediately.<br><br>Per policy, after receiving an emergency grievance alleging an offender is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance and any portion thereof that alleges the substantial risk of imminent sexual abuse) to the PREA Manager who will forward the report for immediate corrective actions. The initial response shall be provided within 48 hours, and the final decision within 5 calendar days. The initial response and the final agency decision shall document the agency's determination whether the offender is at substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.<br><br>Per policy, the agency may discipline an offender for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the offender filed the grievance in bad faith.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility’s policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.53** | **Inmate access to outside confidential support services** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures |

• Inmate Handbook English/Spanish
• MOU with The YWCA Safe Harbor
• PREA Posters English/Spanish
• Offender Handbook

Interviews:
1. Random Offenders
2. Targeted Offenders
3. PREA Coordinator/PREA Compliance Manager

Interviews with offenders demonstrated 29 offenders formally interviewed were aware the facility made victim advocates available for them in the event offenders are sexually abused while in the program.

**HCSO Policy 4D-22-8**

The Sheriff's Office will attempt to make available a victim advocate from a rape crisis center, qualified community-based organization staff member or a qualified agency staff member. This advocate shall accompany and support the victim through the forensic medical examination process, investigatory interviews and shall provide emotional support, crisis intervention, information and referrals. The Sheriff's Office has a memorandum of understanding (MOU) with the YWCA of Richmond for victim advocate services. CFR§115.53

2. The PREA hotline (804) 501-5586, monitored by the PREA Manger, can also be used as a method to receive third-party reports of sexual abuse/sexual harassment from inmates as well as member of the public. Information on reporting sexual abuse on behalf of an inmate will be
made available to the public. Inmate can report to outside resources by calling the YWCA of Richmond (804) 612-6126 or the National Sexual Abuse Hotline 1 (800) 656-4673. CFR §115.53 (a)
3. The facility shall 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. CFR §115.53 (b)

**Analysis/Reasoning**

Henrico County Sheriff's Office provides access to outside victim advocates for emotional support services related to sexual abuse to all inmates by providing both the mailing addresses and telephone numbers for the YWCA of Richmond. During the site review and upon review of supporting documentation, it was determined that the mailing address was not provide to the inmates in accordance with the standard. However, during the writing of this report, supporting documentation was provided to this auditor showing postings that were placed in each housing unit to include the services provided by YWCA, contact information to include phone number, address, fax number and email address.

Additionally, during the site review there was information was located in the lobby for

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| | the general public as to how they can report sexual abuse and sexual harassment in the jail to the PREA Coordinator and Jail Administration. Contact information is provided in addition to the YWCA and the National Sexual Abuse Hotline toll free number.<br><br>Per staff interviews, mail to the YWCA would be is considered privileged correspondence.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.54** | **Third-party reporting** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br><br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Facility Website<br><br>Interviews:<br>1. Random Offenders<br>2. Targeted Offenders<br>3. Officers<br>4. Supervisory staff<br><br>Interviews with offenders demonstrated many were aware of third-party reporting and that a trusted adult in the community could report for them. Interviews with Deputies and facility personnel demonstrated each would accept a third-party report and report the allegation to their immediate supervisor as soon as possible.<br><br>**HCSO Policy 4D-22-8**<br>XX. THIRD-PARTY REPORTING CFR§115.54<br><br>1. The facility shall 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, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.<br><br>**Analysis/Reasoning** |

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| | The Henrico County Sheriff's Office website gives the general public information on how to report sexual abuse or sexual harassment. This information provides the names of the PREA Coordinator and both PREA Compliance Managers with their contact information to include phone number and email addresses. This information is provided in both English and Spanish. In addition to the agency PREA contact information being listed on the website, information is also listed on how to report incidents of sexual abuse/harassment to the following entities: YWCA Richmond (804) 612-6126 National Sexual Abuse Hotline 1 (800) 656-4637.<br><br>During the on-site review, information was located in the lobby for the general public as to how they can report sexual abuse and sexual harassment in the jail to the PREA Coordinator by proving the phone number and email address. This information is also, located on Henrico Sheriff's Office website https://henrico.us/sheriff/prea-statement-reports/. Staff and investigator interviews confirmed they receive allegations of sexual abuse or sexual harassment from third party reporters and that these are reported to investigators immediately and investigated. Staff interviews confirmed third party reporting through fellow offenders, family members, attorneys, and outside advocates. Offender interviews confirmed their awareness of reporting sexual abuse or sexual harassment to others outside of the facility and the ability to have a third-party report on their behalf if the need arose.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| **115.61** | **Staff and agency reporting duties** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Investigative Files<br>Interviews:<br>1. Deputies<br>2. Medical and Mental Health staff<br><br>Interviews with the facility staff demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.<br><br>**HCSO Policy 4D-22-8**<br>XV. STAFF AND AGENCY REPORTING DUTIES CFR §115.61 |

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| | 1. The Sheriff's Office requires 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 a part of the agency; retaliation against inmates or staff who reported such an incident; an any staff neglect or violation of responsibilities that may have contributed to the incident or retaliation.<br><br>2. Apart from reporting to designated supervisors or investigators, staff shall not reveal 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.<br><br>3. Unless otherwise precluded by Federal, State or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (1) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.<br><br>4. If the alleged victim is under the age of 18 or over 65 years of age or considered a vulnerable adult under a State or local vulnerable person's statue, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.<br><br>5. The Sheriff's Office shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated PREA compliance manager and investigators.<br><br>**Analysis/Reasoning**<br><br>The Auditor interviewed randomly selected staff members. Each was asked if they are required to report any knowledge, suspicion or information related to sexual abuse, sexual harassment, retaliation, staff neglect or violation of duties. Each staff member informed the Auditor they are required to immediately report. When asked who they share the information with staff informed they report to their supervisor and are not allowed to discuss the incident details with anyone other than investigators, classification, and medical staff.<br><br>The Auditor interviewed medical and mental health practitioners. Each was asked if they report sexual abuse to anyone. The contract personnel stated they inform a security supervisor when an offender report suffering sexual abuse in a confinement facility. The Auditor asked who they inform if the victim is a youthful offender. Each stated they are to mandatorily report victimization of youthful offenders under mandatory reporting laws.<br><br>The Auditor discussed informed consent, limitations of confidentiality, and duty to report with medical and mental health practitioners. Medical and mental health practitioners are aware of the requirement to inform offenders of their limits of confidentiality and their duty to report at the initiation of services. The Medical Department intake form contains a general consent for treatment and services.<br><br>**Conclusion** |

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| | The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| 115.62 | Agency protection duties |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br><br>Interviews:<br>1. Deputies<br>2. Classification Staff<br><br>During the onsite review there were no offenders placed in restricted housing by facility personnel for reasons of sexual victimization; however, each were aware of limited victim privileges and documenting.<br><br>**HCSO Policy 4D-22-8**<br>When the Sheriff's Office learns that an inmate is subject to substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate. CFR §115.62<br><br>**Analysis/ Reasoning**<br><br>The Auditor conducted interviews with security supervisors and classification staff. Security supervisors informed the Auditor they ensure an inmate who is at risk of imminent sexual abuse is removed from his/her current housing to maintain the inmate's safety. Supervisor's immediately report the information to the facility's sexual abuse investigator.<br><br>The Auditor asked randomly selected security and non-security staff members what actions they take when they learn an inmate is at risk of imminent sexual abuse. Each security staff member informed they would separate the inmate and immediately inform their supervisor. Non-security staff members informed the Auditor they would immediately inform the Shift Commander.<br><br>In the past 12 months, there were (1) number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse. If the agency or facility made such determinations in the past 12 months, the average amount of time (in hours) that passed before taking action (1 hour).<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and offenders and determined that the facility meets |

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| | the requirements of this standard. |

| 115.63 | Reporting to other confinement facilities |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br><br>Interviews:<br>1. Jail Administrator<br>The interview with the Warden IV demonstrated that he was aware that upon receiving an allegation that an offender was sexually abused while confined at another facility he would personally notify the Jail Administrator/Warden from the facility where the allegation was alleged to have occurred within 72 hours of receipt of the allegation.<br><br>**HCSO Policy 4D-22-8**<br><br>Upon receiving an allegation that an offender was sexually abused while confined at another facility, the Jail Administrator or PREA Coordinator that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. CFR §115.63<br><br>**Analysis/Reasoning**<br><br>In the past 12 months, there was (1) number of allegations the facility received that an inmate was abused while confined at another facility. In the past 12 months, there was one (2) number of allegations of sexual abuse the facility received from other facilities. If the Jail receives an allegation that an offender was sexually abused, while confined at another facility, the Jail Administrator or their designee will notify the facility head where an alleged abuse occurred within seventy-two (72) hours. The notification will be documented and ensure that the allegations are investigated in accordance with the PREA standards.<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of the facility’s policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| 115.64 | Staff first responder duties |
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**Policy, Materials, Interviews and Other Evidence Reviewed**

- Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures
- Interviews with Random Line Staff
- Interviews with Supervisory Staff
- First Responder Sexual Assault Response Checklist

Interviews with Officers demonstrated they were aware of their first responder responsibilities to include separating victims from their abusers, block of the scene, secure and ensure evidence on persons or in the area was not tampered with, take the victim to medical and document their involvement on a staff statement form.

**HCSO Policy 4D-22-8**

A member of the Sheriff’s Office, who has information that an offender has been or may have been sexually abused, sexually assaulted or is being threatened for sexual activity will verbally report the information to their Shift Supervisor in a confidential manner and complete the PS-MED 099 “First Responder Sexual Assault Response Checklist” as well as ensuring that an incident report has been completed in Offendertrak. CFR§115.64

**Analysis/Reasoning**

The Henrico County Sheriff’s Office has received (9) allegation that an offender was sexually abused in the past 12 months. Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was (9). Of the allegations that an inmate was sexually abused made in the past 12 months, there were (2) number of times a non-security staff member was the first responder. Of those allegations responded to first by a non-security staff member, there were (2) number of times that staff member requested that the alleged victim not take any actions that could destroy physical evidence. Of those allegations responded to first by a non-security staff member, there were (2) number of times that staff member notified security staff:

Upon learning of an allegation that an offender was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, 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; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

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| | **Conclusion**<br><br>The Auditor conducted a thorough review of the facility’s policy and procedures, conducted interviews with staff and offenders and determined that the facility meets the requirements of this standard. |

| 115.65 | Coordinated response |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• PREA Coordinated Response Plan<br>• Interviews with Random Line Staff<br>• Interviews with Supervisory Staff<br>• First Responders<br><br>Interviews:<br>1. Jail Administrator<br>2. Interviews with the Jail Administrator demonstrated the response to allegations of sexual assault is written to coordinate actions taken in response to sexual abuse and sexual harassment incidents.<br><br>**HCSO Policy 4D-22-8**<br><br>The Sheriff’s office will take the following coordinated actions in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership. CFR §115.65<br><br>**Analysis/Reasoning**<br><br>Interviews with the Sheriff and staff confirmed they are knowledgeable of their duties to coordinate actions taken in response to an incident of sexual abuse. This auditor reviewed the PREA Coordinated Response Plan for incidents of sexual abuse. The plan consisted of systematic guidance for SART members which includes the Major of Quality Assurance, PREA Coordinator, PREA Compliance Manager, Medical, Mental Health, Investigators/Internal Affairs, SANE of SAFE of St. Mary’s Hospital, and staff first responders.<br><br>**Conclusion**<br><br>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard. |

| 115.66 | Preservation of ability to protect inmates from contact with abusers |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>Code of Virginia<br>Interview with PREA Coordinator<br>Interview with PREA Compliance Manager<br><br>Interview:<br>1. The interview with the Jail Administrator demonstrated the facility does not engage in collective bargaining.<br><br>The HCSO has not entered into any agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with offenders pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.<br><br>In accordance with the Code of Virginia, collective bargaining is prohibited. Per 40.1-57.2, "no state, county, municipal, or like governmental officer, agent or governing body is vested with or possesses any authority to recognize any labor union or other employee association as a bargaining agency of any public officers or employees, or to collectively bargain or enter into any collective bargaining contract with any such union or association or its agents with respect to any matter relating to them or their employment or service."<br><br>**Conclusion**<br><br>Based on the information discovered in the Code of Virginia and interview with the PREA Coordinator, the auditor has determined the facility meets the requirements of the standard. |

| 115.67 | Agency protection against retaliation |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br><br>Interviews:<br>PREA Coordinator<br>REA Compliance Manager |

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| | The interview with the PREA Coordinator demonstrated she would initiate contact with the offender upon receipt of the allegation and explain the retaliation -monitoring process. The PREA Compliance Manager stated for up to 90 days or as long as is necessary retaliation monitoring would include offender behaviors, job changes, housing changes and disciplinary reports.<br><br>**HCSO Policy 4D-22-8**<br><br>The agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. CFR§115.67 (b)<br><br>The Sheriff's Office shall 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. The PREA coordinator will be in charge of monitoring retaliation for at least 90 days following report of sexual abuse through follow-up interviews. CFR §115.67<br><br>For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff,and shall act promptly to remedy any such retaliation. Items the agency should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. CFR §115.67 (c)<br><br>If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation. CFR §115.67 (e)<br><br>**Analysis/Reasoning**<br><br>HCSO has a policy to protect all offenders and staff who report sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff and designate the PREA Coordinator with monitoring retaliation. The PREA Coordinator monitors weekly for 90 days.<br><br>HCSO has multiple protection measures, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offenders or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.<br><br>For at least 90 days following a report of sexual abuse, the HCSO monitors the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to see if there are |

changes that may suggest possible retaliation by offenders or staff and are act promptly to remedy any such retaliation.

There were (0) number of times an incident of retaliation occurred in the past 12 months.  There are periodic status checks performed. Items HCSO monitor include any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. HCSO continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. If any other individual who cooperates with an investigation expresses a fear of retaliation, HCSO takes appropriate measures to protect that individual against retaliation.

**Conclusion:**

The Auditor determined the facility meets the requirements of this standard.

| 115.68 | Post-allegation protective custody |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Memorandum<br><br>During the past 12 months, the Henrico County Sheriff’s Office Regional Jail West did not experience any incidents of inmates being involuntarily segregated due to them being at high risk for sexual victimization. A copy of this memorandum will be placed in the PREA file for standard 115.68.<br><br>Interviews:<br>PREA Coordinator<br>REA Compliance Manager<br><br>The interview with the PREA Coordinator demonstrated she would initiate contact with the offender upon receipt of the allegation and explain the retaliation monitoring process. The PREA Compliance Manager stated for up to 90 days or as long as is necessary retaliation monitoring would include offender behaviors, job changes, housing changes and disciplinary reports.<br><br>**HCSO Policy 4D-22-8**<br><br>For post-allegation protective custody, any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of §115.43. Please refer to Sheriff’s Office policy 2A-46—Special Management Inmates. CFR§115.68<br><br>**Analysis/Reasoning** |

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| | HCSO has a policy to protect all offenders and staff who report sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff and designate the PREA Coordinator with monitoring retaliation. The PREA Coordinator monitors weekly for 90 days.<br><br>HCSO has multiple protection measures, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offenders or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.<br><br>For at least 90 days following a report of sexual abuse, the HCSO monitors the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by offenders or staff and are act promptly to remedy any such retaliation.<br><br>There were (0) number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment.<br><br>There were (0) number of inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement.<br><br>From a review of case files of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months, there are (0) number of case files that include BOTH (a) a statement of the basis for facility’s concern for the inmate’s safety, and (b) the reason or reasons why alternative means of separation could not be arranged.<br><br>**Congratulations**<br><br>The Auditor determined the facility meets the requirements of this standard. |

| **115.71** | **Criminal and administrative agency investigations** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Investigative Files<br>• Investigator Training Records<br><br>Interviews:<br>Jail Administrator |

PREA Compliance Manager
Investigator
Offenders who Reported Sexual Abuse

The interview with the Investigator demonstrated the facility completes investigations for every allegation of sexual harassment and sexual abuse. The Investigator stated she reads through statements and begins a preliminary investigation to determine if the allegation meets PREA definition. When the allegation is determined to meet PREA criteria, the investigator interviews the victim, provides the victim medical and mental health options and information on retaliation monitoring. Next the investigator reviews policies and procedures, requests statements from anyone the victim states were involved and or in the area during the allegation, collects any evidence and begins documentation of the investigation in the system. The Investigator stated she would contact the PREA Compliance Manager, Law Enforcement, and the CDI if the evidence collected meets the criteria of a criminal investigation.

**HCSO Policy 4D-22-8**

XIX. CRIMINAL AND ADMINISTRATIVE AGENCY INVESTIGATIONS CFR §115.71
1. When the Sheriff's Office conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly and objectively for all allegations, including third-party and anonymous reports.
2. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.
3. When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with the County Attorney's Office as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.
4. The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff.
5. Administrative Investigations:
a. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and
b. Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.
6. Criminal investigations shall be documented in a written report that contains a thorough description of physical testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

a. Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.
b. The agency shall retain all written reports in reference to sexual abuse and/or harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

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| | 7. The departure of the alleged abuser or victim from the employment or control of the agency shall not provide a basis for terminating the investigation.<br><br>**Analysis/Reasoning**<br><br>The HCSO conducts investigations promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. Where sexual abuse is alleged, HCSO uses investigators who have received special training in sexual abuse investigations.<br><br>Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.<br><br>When the quality of evidence appears to support criminal prosecution, HCSO conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. All criminal prosecution cases are referred to County Attorney’s Office.<br><br>The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as offender or staff. No agency requires an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.<br><br>Criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Substantiated allegations of conduct that appear to be criminal are referred for prosecution to the County Attorney’s Office. HCSO retains all written reports for as long as the alleged abuser is incarcerated or employed by HCSO plus five years. The departure of the alleged abuser or victim from the employment or control of HCSO or agency does not provide a basis for terminating an investigation.<br><br>**Conclusion**<br><br>The Auditor was able to conclude the facility Investigator is conducting appropriate investigations of sexual abuse and sexual harassment. The Investigator has received appropriate training and is aware of the requirements of this standard. The Auditor determined the facility meets the requirements of this standard. |

| **115.72** | **Evidentiary standard for administrative investigations** |
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| | **Auditor Overall Determination:** Meets Standard |

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| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Investigative Report<br>• Interviews:<br>Investigator<br><br>The interview with the Investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.<br><br>**HCSO Policy 4D-22-8**<br><br>The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. CFR §115.72<br><br>**Analysis/Reasoning**<br><br>HCSO imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.<br><br>**Conclusion**<br>The Auditor determined the facility meets the requirements of this standard. |

| **115.73** | **Reporting to inmates** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Memorandum re: No Incidents<br>• Memorandum re: No Staff on Offender abuse<br><br>Interviews:<br>Investigator<br><br>The interview with the Investigator demonstrated notification requirements to victims was given verbally and in writing. Documentation of notifications is to be documented on MED-099G Allegation of Sexual Abuse—Report to Offender.<br><br>**HCSO Policy 4D-22-8** |

j. CFR §115.73 (c) Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:
(1) The staff member is no longer posted within the inmate's unit;
(2) The staff member is no longer employed at the facility;
(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
(5) Following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever:
(6) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
(7) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
(8) All such notifications or attempted notifications shall be documented. CFR §115.73
(9) An agency's obligation to report under this standard shall terminate if the inmate is released from the agency's custody. CFR §115.73
d. Victims of Sexual Assault or Harassment shall not be subject to polygraph examinations.
CFR§115.73(e)
e. Following an investigation into an inmate's allegations that he or she suffered sexual abuse in the facility, the Sheriff's Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This information will be conveyed by the completion of form MED-099G Allegation of Sexual Abuse—Report to inmate. CFR§115.73

**Analysis/Reasoning**

Following an investigation into an offender's allegation that they suffered sexual abuse in an agency facility, HCSO informs the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If HCSO did not conduct the investigation, it will request the relevant information from the investigative agency to inform the offender.

Following an offender's allegation that a staff member has committed sexual abuse against the offender, HCSO subsequently informs the offender unless HCSO has determined that the allegation is unfounded) whenever the staff member is no longer posted within the offender's unit; the staff member is no longer employed at HCSO learns that the staff member has been indicted on a charge related to sexual abuse within HCSO; or HCSO learns that the staff member has been convicted on a charge related to sexual abuse within HCSO.

Following an offender's allegation that they had been sexually abused by another offender, HCSO subsequently informs the alleged victim whenever HCSO learns that the alleged abuser has been indicted on a charge related to sexual abuse within HCSO or HCSO learns that the alleged abuser has been convicted on a charge related

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| | to sexual abuse within HCSO. All such notifications or attempted notifications are documented. An agency's obligation to report under this standard are terminated if the offender is released from HCSO's custody.<br><br>In the past 12 months, there were (9) number of notifications to offenders that were provided pursuant to this standard. Of those notifications made in the past 12 months, the number that were documented was (0).<br><br>The number of investigations of alleged inmate sexual abuse in the facility that were completed by an outside agency in the past 12 months:(0).<br><br>Of the outside agency investigations of alleged sexual abuse that were completed in the past 12 months, the number of offenders alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation: (0).<br><br>In the past 12 months, the number of notifications to offenders that were provided pursuant to this standard: (0).<br><br>Of those notifications made in the past 12 months, the number that were documented: (0).<br><br>**Conclusion**<br><br>The Auditor determined the facility meets the requirements of this standard. |

| **115.76** | **Disciplinary sanctions for staff** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Termination Forms<br><br>Interviews:<br>Jail Administrator<br><br>Interview with the Jail Administrator demonstrated the employee would not be allowed into the facility, he or she would go through the Office of Staff Investigation, be reported to law enforcement and applicable licensing agencies would be notified.<br><br>**HCSO Policy 4D-22-8**<br><br>A. Staff Sanctions CFR§115.76<br>Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. |

**Analysis/Reasoning**

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

The Auditor reviewed facility policy and procedures and interviewed staff to determine the facility meets the elements of this standard. The facility has policies and procedures in place to ensure staff are appropriately disciplined for violations of the facility’s sexual abuse and sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies.

**Conclusion**

The Auditor determined the facility meets the requirements of this standard.

| 115.77 | Corrective action for contractors and volunteers |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Investigative File<br>• Interview with Staff |

Interviews:
1. Jail Administrator
The interview with the Jail Administrator demonstrated any volunteer or contractor would not be allowed into the facility, the associated agency, law enforcement and any applicable licensing agency would be notified.

**HCSO Policy 4D-22-8**

B. Corrective Action for Contractors and Volunteers CFR§115.77
Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

**Analysis/Reasoning**

HCSO policy requires any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The PREA Coordinator confirmed there have been two allegations reported alleging sexual abuse against a contractor, which resulted in immediate termination.

Interviews with contractors confirmed they were aware of Henrico County Sheriff's Office's zero tolerance against sexual abuse and sexual harassment, how to report sexual abuse and sexual harassment and the consequences for engaging in sexual abuse or sexual harassment of offenders.

**Conclusion**

Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.

## 115.78 Disciplinary sanctions for inmates

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**Policy, Materials, Interviews and Other Evidence Reviewed**
• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures
• Offender Handbook English/Spanish
• Incident Detail Report

Interviews:
1. Jail Administrator
The interview with the Jail Administrator demonstrated offender disciplinary procedures would take place, an investigation would be completed, and law enforcement would be notified.

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| | **HCSO Policy 4D-22-8**<br><br>C. Disciplinary Sanctions for Inmates CFR§115.78<br>1. Inmate shall be subject to disciplinary sanctions pursuant to the formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.<br>2. The disciplinary process shall consider whether an inmate's mental disabilities or mental<br>illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Sanctions shall be 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. CFR§115.78 (b)<br>3. The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. CFR§115.78 (e)<br>4. An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced. CFR§115.78 (g)<br><br>**Analysis/Reasoning**<br><br>In the past 12 months, there was (8) number of administrative findings of offender-on-offender sexual abuse that have occurred at the facility. In the past 12 months, there were (0) number of criminal findings of guilt for offender-on-offender sexual abuse that have occurred at the facility.<br><br>The facility reported no incidents in which an offender had been disciplined for filing a report of sexual abuse or sexual harassment. The Auditor conducted formal interviews with medical and mental health practitioners. The Auditor was informed counseling, and other interventions are offered in an attempt to address and correct underlying reasons or motivations for sexual abuse.<br><br>The Auditor was informed that an offender's participation or non-participation in such interventions do not hinder the offenders' ability to attend programming or other benefits. The facilities disciplinary policies, procedures and practices are appropriate to ensure proper disciplinary measures against an offender.<br><br>**Conclusion**<br><br>The Auditor reviewed policy and procedures, interviewed multiple staff and an offender, and determined the facility meets the requirements of this standard. |

| **115.81** | **Medical and mental health screenings; history of sexual abuse** |
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| | **Auditor Overall Determination:** Meets Standard |

**Auditor Discussion**

**Policy, Materials, Interviews and Other Evidence Reviewed**

• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures

Interviews:

Jail Administrator
PREA Compliance Manager
Intake Staff
Medical Staff
Staff Perform Risk of Victimization Screening

Interviews with medical and mental health staff demonstrated disclosure reports are automatically flagged and forwarded to the facility staff. Medical staff stated they would see the offender on the day of the referral and Mental Health staff stated they screen mental health referrals every three days to ensure offenders are seen as quickly as possible.

**HCSO Policy 4D-22-8**

XIV. MEDICAL AND MENTAL HEALTH SCREENINGS CFR§115.81

1. If the screening pursuant to §115.41 indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.
2. If the screening pursuant to §115.41 indicates that an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.
3. If the screening pursuant to §115.41 indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.
4. Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, work, education and program assignments, or as otherwise required by Federal, State or local law.

5. Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

**Analysis/Reasoning**

In the past 12 months, 100% of offenders who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner.  HCSO Policy 4D-22-8 requires all offenders identified as high risk with a history of sexually assaultive behavior or sexual victimization be assessed by a mental health or other qualified professional within 14 days.

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| | In the past 12 months, the percentage of offenders who have previously perpetrated sexual abuse, as indicated during the screening, who were offered a follow-up meeting with a mental health practitioner: (100%).<br><br>**Conclusion**<br><br>The Auditor conducted a thorough review of policy and procedure, and conducted interviews with medical and mental health practitioners, and offenders. After a thorough review the Auditor concluded the facility complies with the requirements of this standard. |

| **115.82** | **Access to emergency medical and mental health services** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>Interviews:<br>1. Medical<br>2. Mental Health<br><br>Interviews with medical and mental health staff demonstrated each are aware of access to emergency medical and mental health services upon receipt of an allegation of sexual abuse. Both stated victims of sexual abuse are provided immediate access to medical and mental health services.<br><br>Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures mandates offender victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Medical staff will be informed when there is a compliant of a sexual assault and will complete the Medical Services Sexual Assault Response Checklist Form PSMED 099C that includes the “Informed Consent for Sexual Assault Forensic Examination Form”.<br><br>Medical staff will arrange for the victim to be transported under appropriate security provisions to St. Mary’s Hospital for treatment and gathering of evidence by a forensic nurse. Members of the Sheriff’s Office or the medical staff will not perform treatment or gather evidence from an inmate who may be a victim of a sexual crime. The Sheriff’s Office will attempt to make available a victim advocate from a rape crisis center, qualified community-based organization staff member or a qualified agency staff member. This advocate shall accompany and support the victim through the forensic medical examination process, investigatory interviews and shall provide emotional support, crisis intervention, information and referrals. The Sheriff’s Office has a memorandum of understanding (MOU) with the YWCA of Richmond for victim |

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| | advocate services.<br><br>Additionally, per Henrico County Sheriff's Office policy, the facility shall 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, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The facility shall 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. While receiving treatment for the assault, the victim will be tested for sexually transmitted diseases.<br><br>Medical staff will request a medical report from the treating hospital of the provided treatment and such documentation may be used in the gathering of evidence for criminal prosecution. Other information to be requested, but not limited to, will be: The medical history taken by health care professionals who conducted an examination to document the extent of physical injury; a copy of the inmate's consent form for an examination and the collection of physical evidence in an approved manner; a copy of the test results for the presence of sexually transmitted diseases.<br><br>Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Upon return to the jail facility from the hospital: Medical staff shall provide the victim prophylactic treatment and follow-up for sexually transmitted diseases to the victim, as appropriate. The Watch Commander will place the inmate on special watch until evaluated by mental health staff. Mental Health staff shall provide a mental health evaluation to assess the need for crisis intervention counseling and long-term follow-up.<br><br>Interviews with the medical and mental health staff confirmed that offender victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The medical and mental health staff indicated that services begin immediately upon notification of a victim of sexual abuse from the shift supervisor. The shift supervisor will ensure that the offender is immediately escorted to medical for an evaluation and/or transport to St. Mary's Hospital for forensic examination.<br><br>Also, the medical staff's interview indicated the medical provider would prepare a consultation and refer the inmate to St. Mary's Hospital for assessment of the patient and determination whether a forensic evaluation and rape kit is required and to begin any sexually transmitted infection prophylaxis treatment/services and orders for follow-up services. Upon completion of the offender's physical examination by the local hospital and upon return to the jail, a mental health evaluation will be performed to determine the potential for suicidal ideation and/or the need for more in-depth |

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| | psychiatric intervention or treatment. At this time, the mental health staff will determine whether the offender may require crisis intervention counseling, and will ensure that it is provided, if it is deemed necessary.<br><br>**Conclusion**<br><br>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, the facility has demonstrated compliance with this standard. |

| 115.83 | Ongoing medical and mental health care for sexual abuse victims and abusers |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Memorandum (No incidents of sexual assault)<br>Interviews with Medical<br>Interviews Mental Health Staff<br><br>Interviews with medical and mental health staff demonstrated a continuum of medical and mental health treatment would begin directly upon receiving allegations of sexual abuse and upon an offender’s return from a forensic exam.<br><br>**HCSO Policy 4D-22-8**<br><br>The evaluation and treatment of such victims shall 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. CFR§115.83<br><br>If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy related medical services. CFR§115.83 (e)<br><br>**Analysis/Reasoning**<br><br>HCSO Policy 4D-22-8 mandates inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and when necessary, referrals for continued care following their transfer to, or placement |

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| | in, other facilities, or their release from custody. If pregnancy results from the conduct, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.<br><br>Per Policy 4D-22-8, upon return to the jail facility from the hospital, medical staff shall provide the victim prophylactic treatment and follow-up for sexually transmitted diseases to the victim, as appropriate. Treatment services shall be provided to the victim without financial cost and<br>regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.<br><br>Interviews with the medical and mental health staff confirmed that victims are offered a sexual assault assessment, individual counseling, medication as ordered by the physician, testing for STD and HIV and follow-up. Mental Health staff would conduct a mental health evaluation to assess the need for crisis intervention counseling and long-term follow-up. The facility also provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including tollfree hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations.<br><br>**Conclusion**<br><br>Based on the review of the agency policy and procedures, observations, and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard. |

| **115.86** | **Sexual abuse incident reviews** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Sexual Abuse Interview Form<br>• Interviews with Staff<br><br>Interviews:<br>• Jail Administrator<br><br>The interview with the Jail Administrator demonstrated the PREA review team will consist of the Jail Administrators, PREA Coordinator, PREA managers, a member of the mental health and medical staff and the audits and contract staff.<br><br>**HCSO Policy 4D-22-8**<br><br>XXII. SEXUAL ABUSE INCIDENT REVIEW CFR§115.86 |

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| | 1. The Sheriff’s Office shall 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. This review will occur within 30 days of the<br>conclusion of the investigation during the weekly Sexual Abuse Response Team (SART) meeting.<br>2. The PREA review team will consist of the Jail Administrators, PREA Coordinator, PREA managers, a member of the mental health and medical staff and the audits and contract staff. The PREA review team will allow input from line supervisors, investigators, and medical or mental health practitioners.<br><br>The review team shall:<br>a. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;<br>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;<br>c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;<br>d. Assess the adequacy of staffing levels in that area during different shifts;<br>e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and<br>f. Prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement. This report shall be submitted to the Sheriff and PREA compliance manager.<br>g. The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so.<br><br>**Analysis/Reasoning**<br><br>The PREA review team will allow input from line supervisors, investigators, and medical or mental health practitioners. The review team shall: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 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; examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement. This report shall be submitted to the Sheriff and PREA compliance manager. The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.<br><br>An interview with an administrative staff and documentation review of the |

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| | investigation reports confirmed that a Sexual Abuse Incident Review Form is prepared upon completion of sexual abuse or sexual harassment investigations. The Incident Review consists of policy or procedure requiring revision, motivation for incident or allegation, assessment physical barriers in the area; adequacy of staffing levels and assessment of monitoring technology and recommendation for improvements.<br><br>The Incident Review Team consisted of the Jail Administrators (Chief), PREA Coordinator, PREA managers, a member of the mental health and medical staff and the audits and contract staff. The facility reported (3) administrative/criminal investigations of alleged sexual abuse and sexual harassment allegations that occurred in this facility in the past twelve (12) months. In the past 12 months, there were (3) number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents. Staff interviews confirmed their knowledge of the process and would document their review on the Sexual Abuse Incident Review Form that captures all aspects of an incident.<br><br>**Conclusion**<br><br>Based on the review of the agency policy and procedures, observations, and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard. |

| **115.87** | **Data collection** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Survey of Sexual Victimization, 2023<br>• Agency Website<br>• Henrico County Sheriff's Office Annul PREA Report 2023<br>• Interviews with Staff<br><br>Interviews:<br>1.Sheriff / Head of Agency<br><br>The interview with the Sheriff demonstrated the agency reviews all incident reports of sexual harassment and sexual abuse, staff and offenders involved in allegations, compile year end reports, and investigations referred for criminal prosecution and look for common trends. The agency focuses on areas to address in the past year and identifies areas needing corrective action. |

**HCSO Policy 4D-22-8**

XXIII. DATA COLLECTION AND REVIEW
A. Data collection CFR§115.87
1. The PREA managers shall collect accurate, uniform data for every allegation of sexual abuse at each facility under its direct control using forms PS MED A-G.
2. The PREA coordinator shall maintain, review and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
2. The PREA coordinator will formulate a report outlining sexual abuse reports at least annually and submit it to the Sheriff for approval.
3. Upon request, the PREA coordinator shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

The PREA review team shall review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices, and training including by:
1. Identifying problem areas;
2. Taking corrective action on an ongoing basis; and
3. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

The agency shall ensure that data collected pursuant to §115.87 are securely retained. The agency shall 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.

**Analysis/Reasoning**

The PREA coordinator shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The PREA coordinator will formulate a report outlining sexual abuse reports at least annually and submit it to the Sheriff for approval. Upon request, the PREA coordinator shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Documentation review of Henrico County Sheriff's Office 2023 Annual Report revealed comprehensive information about PREA, to include statistical data regarding reports of sexual abuse and sexual harassment, were included. The Henrico Sheriff's Office website has annual PREA reports beginning in 2015 are available for public review.

The auditor reviewed the 2023 Survey of Sexual Victimization, Local Jail Jurisdictions Summary Form completed and submitted by the PREA Coordinator on behalf of Henrico Sheriff's Office.

**Conclusion**

Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.

| 115.88 | Data review for corrective action |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures<br>• Henrico County Sheriff's Office Annul PREA Report 2022<br>• Agency Website<br>• Interviews:<br>Jail Administrator<br>PREA Compliance Manager<br><br>**HCSO Policy 4D-22-8**<br>B. Data Review for Corrective Action CFR§115.88<br>The PREA review team shall review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training including by:<br>1. Identifying problem areas;<br>2. Taking corrective action on an ongoing basis; and<br>3. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.<br><br>**Analysis/Reasoning**<br><br>The auditor reviewed the facility’s website. The website includes an annual report of data reviewed. The annual report titled, “PREA Annual Data Collection and Review Report” can be accessed on the document page listed on the facility website.<br><br>The auditor observed sufficient evidence that the Henrico County Sheriff’s Office Authority completes an annual review of collected and aggregated sexual abuse data. The report addresses problem areas and corrective actions taken and was approved by the Jail Administrator. The auditor reviewed the facility’s website, PREA Annual Data Collection and Review Report and interviewed staff to determine the facility meets the requirements of this standard.<br><br>**Conclusion**<br><br>After a thorough review the auditor concluded the facility complies with the requirements of this standard. |

| 115.89 | Data storage, publication, and destruction |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |

**Policy, Materials, Interviews and Other Evidence Reviewed**
• Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures
• Interview with Staff

HCSO Policy 4D-22-8
A. Data Storage, Publication and Destruction CFR§115.89
1. The agency shall ensure that data collected pursuant to §115.87 are securely retained.
2. The agency shall make all aggregated sexual abuse data, from both Jail West and Jail East along with private facilities with which it contracts, readily available to the public at least annually through the agency website.
3. Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed.
4. The agency shall 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.

**Analysis/Reasoning**

The agency shall make all aggregated sexual abuse data, from both Jail West and Jail East along with private facilities with which it contracts, readily available to the public at least annually through the agency website. Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed. The agency shall 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.

The aggregated sexual abuse data was reviewed, and all personal identifiers are removed.  Henrico County Sheriff's Office 2013 Annual Report is posted on the Henrico County Sheriff's Office website and readily available for public review.

An interview with the PREA Coordinator reported that all information is securely maintained in an area where only the PREA Coordinator, PREA Manager, Chief has access.

**Conclusion**

Based on the review of the agency policy and procedures, observations, and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.

| 115.401 | Frequency and scope of audits |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |

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| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Previous PREA Audit Report<br>• Facility Tour<br>• Interactions with Staff<br><br>The facility provided the auditor with a tour of the facility in its entirety. The auditor was provided a private area to conduct interviews with staff and offenders. All documents, files, video, and other information requested by the auditor were provided by facility staff. During informal interviews with offender's, staff moved away from the auditor to allow the inmate privacy when responding to the auditor's questions. Prior to arriving on site, the auditor sent a letter to be posted in all offender's living areas which included the auditor's address. The auditor found sufficient evidence that the Henrico County Sheriff's Office Authority meets the requirements of this standard.<br><br>**Conclusion:**<br><br>The Auditor concluded the Henrico County Sheriff's Office Authority meets the requirements of this standard. |

| **115.403** | **Audit contents and findings** |
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| | **Auditor Overall Determination:** Meets Standard |
| | **Auditor Discussion** |
| | **Policy, Materials, Interviews and Other Evidence Reviewed**<br>• Previous PREA audit report<br>• Agency Website<br><br>The Auditor reviewed the agency's website which includes a link for its previous PREA Audit reports. The reports are easily accessible through a "drop-down" menu on the "Offenders" tab. After accessing the tab, the public can access reports through the "Prison Rape Elimination Act" hyperlink PREA Audit 2023 - Henrico County Sheriff's Office (HCSOva.org). This page includes a "PREA Reports page." Each audit report for Henrico County Sheriff's Office Authority facility is accessible on the page. The Henrico County Sheriff's Office Authority was last audited in August 6, 2021.<br><br>**Conclusion:**<br>The Auditor determined the agency meets the requirements of this standard. |

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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| | Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) | yes |
| | After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.). | yes |
| | After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.) | yes |
| | After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.) | yes |
| | Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) | yes |
| | Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) | yes |
| | Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) | yes |
| **115.52 (g)** | **Exhaustion of administrative remedies** | |
| | If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) | yes |
| **115.53 (a)** | **Inmate access to outside confidential support services** | |
| | Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? | yes |
| | Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, | no |

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

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

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

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

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

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

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

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

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

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| | Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? | yes |
| **115.77 (b)** | **Corrective action for contractors and volunteers** | |
| | In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? | yes |
| **115.78 (a)** | **Disciplinary sanctions for inmates** | |
| | Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process? | yes |
| **115.78 (b)** | **Disciplinary sanctions for inmates** | |
| | Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories? | yes |
| **115.78 (c)** | **Disciplinary sanctions for inmates** | |
| | When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior? | yes |
| **115.78 (d)** | **Disciplinary sanctions for inmates** | |
| | If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? | yes |
| **115.78 (e)** | **Disciplinary sanctions for inmates** | |
| | Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? | yes |
| **115.78 (f)** | **Disciplinary sanctions for inmates** | |
| | For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish | yes |

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

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

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

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

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

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

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

| (f) | | |
|---|---|---|
| | 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 |