

# PREA Facility Audit Report: Final

**Name of Facility:** Travis County Jail and Correctional Complex

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 05/26/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Lori M. Fadorick	<b>Date of Signature:</b> 05/26/2026

AUDITOR INFORMATION	
<b>Auditor name:</b>	Fadorick, Lori
<b>Email:</b>	lfadorick@gmail.com
<b>Start Date of On-Site Audit:</b>	04/13/2026
<b>End Date of On-Site Audit:</b>	04/16/2026

FACILITY INFORMATION	
<b>Facility name:</b>	Travis County Jail and Correctional Complex
<b>Facility physical address:</b>	500 West 10th Street, Austin, Texas - 78701
<b>Facility mailing address:</b>	PO Box 1748, Austin, Texas - 78767

Primary Contact
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<b>Name:</b>	Ana Aguirre
<b>Email Address:</b>	ana.aguirre@traviscountytexas.gov
<b>Telephone Number:</b>	512-854-8168

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Raul Banasco
<b>Email Address:</b>	raul.banasco@traviscountytexas.gov
<b>Telephone Number:</b>	512-854-9746

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Jenny Rivera
<b>Email Address:</b>	jenny.rivera@traviscountytexas.gov
<b>Telephone Number:</b>	512-854-5366

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Mary Gallo
<b>Email Address:</b>	mary.gallo@traviscountytexas.gov
<b>Telephone Number:</b>	512-854-4664

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	2812
<b>Current population of facility:</b>	2438
<b>Average daily population for the past 12 months:</b>	2309
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Both women/girls and men/boys

<b>Age range of population:</b>	17-95
<b>Facility security levels/inmate custody levels:</b>	minimum/medium/maximum
<b>Does the facility hold youthful inmates?</b>	Yes
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	1036
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	65
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	239

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Travis County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	5555 Airport Blvd, Austin, Texas - 78751
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

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

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Ana Aguirre	<b>Email Address:</b>	ana.aguirre@traviscountytexas.gov

## Facility AUDIT FINDINGS

### Summary of Audit Findings

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

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

#### Number of standards exceeded:

4

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.51 - Inmate reporting
- 115.65 - Coordinated response
- 115.71 - Criminal and administrative agency investigations

#### Number of standards met:

41

#### Number of standards not met:

0

## POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-04-13
2. End date of the onsite portion of the audit:	2026-04-16

#### Outreach

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

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	2812
15. Average daily population for the past 12 months:	2309
16. Number of inmate/resident/detainee housing units:	93
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

<b>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	2421
<b>24. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:</b>	16
<b>25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	75
<b>26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	250
<b>27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	12
<b>28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	17
<b>29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	175

<p><b>30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>26</p>
<p><b>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>14</p>
<p><b>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>6</p>
<p><b>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>9</p>
<p><b>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>None</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1036</p>

<b>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	239
<b>38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	65
<b>39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	None

## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

<b>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	20
<b>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<input checked="" type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

<b>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	The auditor selected a mix of males, females and youthful offenders from both the TCJ and TCCC
<b>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	There were no barriers to completing the inmate interviews. The auditor oversampled the youthful offenders, speaking to both males and females.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	20
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>46. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:</b>	6
<b>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2

<p><b>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>3</p>
<p><b>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>3</p>
<p><b>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>2</p>

<p><b>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>6</p>
<p><b>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>4</p>
<p><b>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates.</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>There were no barriers to completing the inmate interviews. Inmates were interviewed in all the specialized categories.</p>

## Staff, Volunteer, and Contractor Interviews

### Random Staff Interviews

**58. Enter the total number of RANDOM STAFF who were interviewed:**

12

**59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)**

- Length of tenure in the facility
- Shift assignment
- Work assignment
- Rank (or equivalent)
- Other (e.g., gender, race, ethnicity, languages spoken)
- None

**60. Were you able to conduct the minimum number of RANDOM STAFF interviews?**

- Yes
- No

**61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):**

Auditor interviewed both male and female staff on all shifts and varied work assignments.

### 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.

**62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):**

30

**63. Were you able to interview the Agency Head?**

- Yes
- No

<b>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>65. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>66. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Other
<b>If "Other," provide additional specialized staff roles interviewed:</b>	Training, Mailroom, Grievance Coordinator
<b>68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	1
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	1
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other

<b>70. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	None
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**SITE REVIEW AND DOCUMENTATION SAMPLING**

**Site Review**

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

<b>71. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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**Was the site review an active, inquiring process that included the following:**

<b>72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<b>73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<b>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<p><b>75. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>The Auditor had full, unimpeded access to all areas of the facility. During the review of the physical plant, the Auditor observed the facility layout, staff supervision of offenders, security rounds, interaction between staff and offenders, shower and toilet areas, placement of PREA posters, observation of availability of PREA information located adjacent to and in the inmate housing areas, observation of communication in general population housing areas, as well as restrictive housing cells, search procedures, and availability and access of medical and mental health services. The Auditor observed and made note of the video monitoring system and camera placement throughout the facility, including reviewing the monitors in the control room.</p>
<p><b>Documentation Sampling</b></p>	
<p>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.</p>	
<p><b>77. 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?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

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

The Auditor conducted a document review of employee and inmate files, and a spot check of documents that were previously provided to the auditor along with the PAQ, including logbooks and other institutional forms. The Auditor reviewed a random sampling of personnel files to determine compliance related to standards on hiring and promotion and background check procedures for officers and contract staff. The auditor reviewed the annual PREA training rosters maintained by the training staff and cross referenced the staff files with the training rosters to ensure training was verified. The training coordinator explained the process for relaying the mandated PREA information to new hires, as well as the procedure for annual refresher training. Random offender case files were reviewed to evaluate intake procedures, including screening and subsequent housing decisions, and verify offender PREA education. In addition, the intake and receiving procedures were observed and intake screenings are conducted in private. The Auditor requested additional supporting documentation to include: training records, randomly chosen inmate medical records, randomly chosen inmate classification records, volunteer records, contractor records, and staff personnel files including PREA disclosure forms for hiring and promotions. Investigative files for the previous 12 months were reviewed for compliance to applicable standards.

## **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.

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

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	65	2	65	2
<b>Staff-on-inmate sexual abuse</b>	76	0	76	0
<b>Total</b>	141	2	141	2

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

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	79	0	79	0
<b>Staff-on-inmate sexual harassment</b>	18	0	18	0
<b>Total</b>	97	0	97	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.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	35	27	3
<b>Staff-on-inmate sexual abuse</b>	0	68	8	0
<b>Total</b>	0	103	35	3

### 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.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	40	31	8
<b>Staff-on-inmate sexual harassment</b>	0	16	2	0
<b>Total</b>	0	56	33	8

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

**Sexual Abuse Investigation Files Selected for Review**

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

15

<p><b>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>7</p>
<p><b>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>8</p>
<p><b>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>10</p>
<p><b>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>5</p>
<p><b>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	5
<b>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	None
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

## Non-certified Support Staff

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

Yes

No

## AUDITING ARRANGEMENTS AND COMPENSATION

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

The audited facility or its parent agency

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

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

Other

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

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO Organizational Chart</li> <li>4. Interviews with Staff including the following: <ol style="list-style-type: none"> <li>a. PREA Coordinator</li> <li>b. Sheriff</li> <li>c. Major</li> <li>d. PREA Compliance Managers</li> </ol> </li> <li>5. Interviews with Inmates</li> <li>6. Observations during on-site review</li> </ol> <p>Findings:</p> <p>The Auditor reviewed the TCSO Policy. The Department has a comprehensive PREA policy which clearly mandates a zero-tolerance policy on all forms of sexual abuse</p>

and harassment. The language in the policy provides definitions of prohibited behaviors in accordance with the standard and includes notice of sanctions for those who have been found to have participated in prohibited behaviors. The definitions contained in the policy are consistent and in compliance with PREA definitions. The policy details the agency overall approach to preventing, detecting and responding to sexual abuse and harassment. There are informational posters prominent in all areas and interactions and interviews with both offenders and staff indicate they are aware of this information. The zero-tolerance mandate appears to be taken seriously by the staff at the facility and this is reflected in both the staff and offender interviews.

TCSO Policy 03-05-09 states, "All staff, contractors, and volunteers shall take the appropriate steps as outlined in this Policy, and in the PREA Coordinated Response Plan, in preventing, detecting, and responding to such conduct. The Office shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The Office shall designate a PREA compliance manager at the Travis County Correctional Complex and a PREA compliance manager at the Travis County Jail. The PREA compliance manager shall have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards."

The TCSO has designated an upper-level staff member as the PREA Coordinator. This is a dedicated position responsible for overseeing the agency's PREA program and adherence to the standards. The position reports to the Corrections Bureau Major. A review of the organizational chart reflects this position in organizational structure.

The PREA Coordinator reports that she has sufficient time and by virtue of her position, the authority to develop, implement and oversee the facility's efforts to comply with PREA standards. The PREA Coordinator is involved in the implementation efforts, as well as handling and reviewing individual offender issues at the facility level. The PREA Coordinator ensures that all facets of the TCSO PREA Program are completed per policy and the PREA standards.

Interviews with facility staff indicated that they were trained in and understood the zero-tolerance policy established by the TCSO. They understand their role with regard to prevention, detection and response procedures.

In addition to the designated PREA Coordinator, TCSO has created a PREA office and assigned 4 staff as PREA Compliance Managers to assist in overseeing PREA compliance efforts at the facility. The auditor interviewed all four compliance managers and found that they are very well-versed in the PREA standards and each have specific duties that they are responsible for handling.

In a targeted interview with the Sheriff, she stated that every allegation is investigated and she is kept in the loop on the progress of each allegation. All allegations are investigated thoroughly and each one is looked at on a case-by-case basis on its own merits.

After a review, the Auditor determined the facility exceeds the requirements of the standard.

	Corrective Action: None
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. Interlocal Cooperation Agreement</li> <li>3. Interviews with Staff including the following:               <ol style="list-style-type: none"> <li>a. PREA Coordinator</li> <li>b. Major</li> </ol> </li> </ol> <p>Findings:</p> <p>The TCSO has an Interlocal Cooperation Agreement (ILA) with Comal County, Texas. The agreement was effective on September 30, 2025 and automatically renews each October 1 for 5 one-year terms.</p> <p>The agreement allows Travis County to conduct periodic inspections, and federal inspection reports be provided upon request.</p> <p>Per information from the PREA Coordinator and the Major, the TCSO does not currently and has not within the audit period utilized the contract and Comal County for the confinement of inmates at TCSO.</p> <p>This standard is not applicable at this time for the TCSO.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO Policy 03-01-06 Security Patrols</li> </ol>

4. TCSO PREA Federal Standards and Compliance
5. Staffing Plan
6. Unannounced rounds
7. Observations during on-site review

Interviews with the following:

- PREA Coordinator
- Corrections Bureau Major
- Random Staff
- Supervisors Responsible for Conducting Unannounced Rounds

Observation of the following:

- Observation of unannounced rounds by supervisors as well as auditors during the site review
- Observation of supervisors documenting rounds in the daily logbooks on the duty post during the site review

Findings:

The TCSO has a comprehensive staffing plan that addresses all required elements of the standard. Related policies are written in accordance with the standard. TCSO policy states:

III. Supervising and monitoring—[§115.13]

A. This Office shall ensure that each facility it operates shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates 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 inmates 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. [§115.13(a)]

B. In circumstances where the staffing plan is not complied with, this Office shall document and justify all deviations from the plan. [§115.13(b)]

C. Whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.11, this Office shall assess, determine, and document whether adjustments are needed to:

- (1) The staffing plan established pursuant to paragraph (A) of this section;
- (2) The facility's deployment 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. [§115.13(c)]

D. Each agency operating a facility 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 practice shall be implemented for night shifts as well as day shifts. Each agency shall have a policy to prohibit staff 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. [§115.13(d)]

The staffing plan addresses staffing in each area, staffing ratios, programming, facility layout, composition of the inmate population, video monitoring and other relevant factors. The most recent annual review of the staffing analysis was completed in 2025 by the PREA Coordinator. The facility staffing requirements are based upon a multi-faceted formula to determine the number of staff needed for essential positions. The staffing plan does require any deviations be documented and justified.

Notations and daily deviations from the regular staffing plan are notated by the supervisor and reported to the relevant Division Commander. Per the PAQ, there have been no deviations from the staffing plan. This was confirmed by the Major.

The TCSO does have current vacancies. Per the Major, the overall vacancy rate at the time of the onsite review was 14%. The facility utilizes mostly voluntary overtime to fill vacancies. The agency can also adjust post staffing for select post assignments if needed. If there are circumstances where the staffing plan is not complied with, the facility would document and justify all deviations in accordance with the standard.

The average daily population since the last PREA Audit is 2290. The staffing plan is predicated on a population of 2311. The auditor reviewed the facility's current staffing plan as well as the most recent staffing plan review. In that review, they have documented that they have considered all the elements from standard 115.13 (a) (1-15) as part of the review. During a targeted interview with the Major, the auditor verified that he and the Sheriff review the annual staffing plan. The Major indicated that the Captains and he closely monitor staffing and any post closures. If there were an instance where the facility did not comply with their staffing plan, that instance would be notated on the supervisor log and reported through the Captain, including the reason for the shortage and the actions taken. According to staff and the PAQ, there were no instances where they were out of compliance with the staffing plan during the audit period.

Per the administrative staff, staffing is unofficially reviewed every few weeks and is officially reviewed and documented annually. They use voluntary overtime to fill shortages and sometimes must initiate mandatory overtime. All posts are covered to maintain required minimum staffing.

The Captains and Major stated that they do consider the use of CCTV in the staffing

plan. They regularly do camera reviews and assess areas that need additional coverage. Camera surveillance is maintained throughout the facility in the inmate living areas, corridors, hallways and work and program areas.

Per the staffing plan, TCSO deploys a wide array of video monitoring technology throughout the various jail buildings and sections, to assist staff in keeping inmates sexually safe. There are currently 1236 cameras located throughout the Corrections Bureau, with recording and playback capabilities, to monitor the sexual safety of the inmate population and assist in investigations of potential PREA incidents. Each year, facility leadership assesses all video systems and requests funding to upgrade, repair and add to existing cameras, monitors, computers and the wide array of additional equipment it takes to support the technology. During 2025 new cameras were added throughout the facility, both downtown and at Del Valle. Only authorized supervisory staff have unrestricted access to view all the cameras.

The auditor reviewed the most recent annual review, and the facility's review was in compliance with the elements of 115.13(a). In addition, during the on-site review, the auditor reviewed the deployment of CCTV monitoring. The facility has a camera surveillance system comprised of multiple monitors located in the control room.

These screens are monitored by staff at all times. The most recent review of the staffing plan indicated the video monitoring system and placement of cameras were reviewed. There are cameras covering all areas of the facilities. The cameras are accessible from multiple locations.

In accordance with the provisions of the staffing plan, TCSO, in collaboration with the PREA Coordinator, reviewed the staffing plan to see whether adjustments are needed to: (a) the staffing plan, (b) the deployment of monitoring technology, or (c) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan. This was documented by the PREA Coordinator.

The staffing plan appears satisfactory in the agency's efforts to provide protection against sexual abuse and harassment. The Auditor observed cameras in all areas of the facility. There appeared to be open communication between staff and inmates. The Auditor observed formal and informal interactions between staff and inmates.

In the PAQ, the agency reports that they conduct unannounced rounds on all shifts.

Policy 03-01-06 states: B. During each shift, the Sergeants and/or shift supervisors will conduct unannounced security patrols (visuals) of all assigned areas under their authority occupied by inmates, observing and conversing with inmates and staff. The purpose of this security patrol (visual) is to identify and deter staff sexual abuse and sexual harassment, to address staff and inmate concerns, to inspect for unsafe, unsecure, or unsanitary conditions such as changes in equipment or other features of the physical plant, accumulations of contraband, and conditions that would constitute life safety or security hazards. Documentation of these patrols will be reflected utilizing the electronic post log. Immediate action must be taken to address life safety and security hazards. Immediate actions will be documented appropriately, and the section Lieutenant will be advised. [115.13 (d) - 1,2,3,4]

	<p>C. Each month, facility Lieutenants shall conduct unannounced security patrols (visuals) in order to identify and deter staff sexual abuse and sexual harassment, to encourage informal contact with staff and inmates, and to informally observe living and working conditions. These visits shall be implemented for all shifts. Staff are prohibited from alerting other staff members of these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility. Documentation of these patrols will be reflected utilizing the electronic post log and the Lieutenants bureau inspection form. [115.13 (d) - 1,2,3,4]</p> <p>A review of the TCSO policies indicated that policy requires that supervisors will conduct and document unannounced rounds each shift, and that there is a prohibition against staff alerting other staff of the rounds. During the pre-audit phase, the facility provided the auditor a sample of documentation of unannounced rounds for each shift. The auditor reviewed duty post logs, as well as supervisor rounds. This documentation sampling verified that unannounced rounds were conducted during all shifts. During the on-site portion of the audit, the auditor reviewed logbooks that verified that unannounced rounds were recorded daily and documented by the supervisors. It is clear through observation that supervisors and administrators are conducting unannounced rounds. Interviews with supervisors, as well as line staff indicate that the rounds are unannounced and random.</p> <p>Targeted interviews with the Major and Captains revealed that as with other facilities, they are short-staffed. They feel as if the camera coverage they currently have is sufficient and are used in the overall management plan for the facility. They stated that they continually do camera reviews and assess any additional needs on a regular basis.</p> <p>The Captain stated that they ensure that all posts are covered and staff work voluntary overtime if needed to supplement the shift strength.</p> <p>After a review, the Auditor determined that the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO PREA Federal Standards and Compliance</li> <li>4. TCSO Policy 02-01-10 Juvenile Operations</li> </ol>

5. TCSO Policy 04-08-03 Inmate Recreation

6. Review of population report on the day of the audit as well as population reports from the previous 12 months

Interviews with the following:

- PREA Coordinator
- Youthful Inmates
- Staff that supervise youthful inmates

Observation of the following:

- Site Review

Findings:

The TCSO policy is consistent with the standard and states that an adjudicated offender shall not be placed in a housing unit in which they will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.

Policy 04-08-03 states, "Juveniles shall be separated at any and all times by sight and sound from adults detained in the same building. Separation requires that adults and juveniles in detention are unable to see each other or to converse (Tex. Fam. Code § 51.12)."

TCSO PREA Federal Standards and Compliance Policy states:

A. 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. In areas outside of housing units, this Office shall either:

(1) maintain sight and sound separation between youthful inmates and adult inmates, or

(2) provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact. [§115.14(b)]

C. This Office shall make best efforts to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, agencies shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible. [§115.14(c)]

Policy also states that best efforts to avoid placing juvenile (youthful) inmates in isolation in order to comply with this provision shall prevail. Per the PREA Coordinator, a youthful inmate would only be held in restrictive housing if their behavior dictates such. This was confirmed by the Captain and officers that supervise youthful inmates.

Absent exigent circumstances, juvenile (youthful) inmates shall not be denied daily large muscle exercise and any legally required special education services to comply with this provision. Juvenile (youthful) inmates shall also have access to other

	<p>programs and work opportunities to the extent possible. This was confirmed by the Captain and officers that supervise youthful inmates.</p> <p>Per the PAQ, in the past 12 months, the number of housing units to which youthful inmates are assigned that provide sight and sound separation between youthful and adult offenders in dayrooms, common areas, showers, and sleeping quarters: 2: TCJ - 2N (Females); TCCC - 2G/2F (Males)</p> <p>The auditor interviewed 6 youthful inmates, both male and female. They all confirmed that they were housed separately, did not have any contact with adult offenders, and had access to programs and recreation.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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115.15	Limits to cross-gender viewing and searches
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO Policy 03-01-12 Searches</li> <li>4. TCSO Policy 03-01-02 Staff Interaction with Inmates</li> <li>5. Duty Post Logs</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• Random Staff</li> <li>• Random Inmates</li> <li>• Captain re cameras</li> </ul> <p>Observation of the following:</p> <ul style="list-style-type: none"> <li>• Observation of inmate housing area</li> <li>• Observation of CCTV coverage of housing areas and individual protective cells</li> <li>• Observation of staff announcing the presence of opposite gender staff during site review</li> </ul> <p>Findings:</p> <p>The TCSO policies prohibit cross-gender strip searches and cross-gender visual body cavity searches absent exigent circumstances. The TCSO does not conduct cross-gender body cavity searches except when performed by medical practitioners. TCSO policy 03-01-12 states that: "All authorized unclothed (strip) searches shall be</p>

conducted by corrections officers of the same classification gender as the inmate(s) being searched except in exigent circumstances and only with the approval of a lieutenant or above. All cross-gender unclothed searches of inmates shall be documented in a Corrections Incident Report.”

TCSO policy also states that all inmates shall be afforded privacy when these searches are performed and such searches shall be performed in concealed areas where the search cannot be observed by persons not physically conducting the search. This does not exclude the presence of as many sworn officers as deemed necessary to perform the search in a safe manner. All strip searches shall be performed by persons of the same sex as the person being searched. Cross-gender strip searches shall not be conducted absent exigent circumstances. If due to exigent circumstances and cross-gender strip searches must be conducted, these must be documented.

Interviews with facility staff, including medical personnel indicate operational practice is consistent with this policy. The facility reports in the PAQ and verified through staff interviews that no cross-gender strip searches or visual body cavity exams have occurred. The auditor observed the areas where strip searches occur. There are separate areas for searches of male and female inmates. The auditor found the strip search areas to be adequate in providing privacy from viewing by opposite gender staff or incidental viewing by anyone not performing the strip search.

The TCSO holds both male and female offenders.

TCSO policy states that inmates are able to shower, change clothes and perform bodily functions without nonmedical staff of the opposite gender viewing their breasts, buttocks or genitalia, except in exigent circumstances or incidental to routine cell checks. Policy 03-01-02 states, “Inmates will be given the opportunity to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (post visuals).” The toilet and shower areas are adequately private. A review of CCTV coverage in common areas, bathroom areas and individual protective cells revealed that the cameras were pointed away from toilet areas or covered.

The TCSO policy states that staff of the opposite gender shall announce their presence when entering an inmate housing unit in accordance with the standard. There are announcements made regularly and this is logged in the logbook. Random inmate interviews of both males and females indicated that there is not an issue with them being able to change clothes, shower or perform bodily functions without opposite gender officers seeing them. Offenders stated that announcements are being made when opposite gender staff enter the housing units. Staff interviews also indicate the offenders’ privacy from being viewed by opposite gender staff is protected. Curtains and partitions afford offenders appropriate privacy while still affording staff the ability to appropriately monitor safety and security. Cameras are placed appropriately so that shower and toilet areas are not in direct view. The auditor observed all areas in the offender housing units where inmates may be in a

	<p>state of undress and concluded that these areas are sufficiently private to prevent viewing by opposite gender staff.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO Policy 03-01-04 Inmate Authority</li> <li>4. Forms, pamphlets, handouts, posters</li> <li>5. List of bi-lingual staff</li> <li>6. PREA Training Video in English and Spanish and with subtitles</li> <li>7. Agreement with commercial interpreter service (LanguageLine)</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• Random Staff</li> <li>• Classification Staff</li> <li>• Intake Staff</li> <li>• Inmates who have limited English proficiency and other disabilities</li> </ul> <p>Observation of the following:</p> <ul style="list-style-type: none"> <li>• Observation of Interpretive Service access posters in classification as well as booking area</li> </ul> <p>Findings:</p> <p>The TCSO, in accordance with policy takes appropriate steps to ensure that offenders with disabilities, including those who are deaf, blind or have intellectual limitations have an equal opportunity to participate and benefit from all aspects of the facility's efforts to prevent, detect and respond to sexual abuse and harassment. TCSO policy 03-05-09 is written in accordance with the standard and indicates that:</p> <p>III. This Office shall take appropriate steps to ensure that inmates who have limited English proficiency and/or inmates with disabilities (including, for example, inmates 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</p>

participate in or benefit from all aspects of this Office's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, but are not limited to:

- A. Providing on hand English and Spanish speaking presentations, with other languages available via language line, and American Sign Language presentations through visual and audible media to inmates at Intake and throughout their incarceration;
- B. Providing alternative materials to inmates who have limited English proficiency and/or disabilities in formats or through methods that ensure effective communication including inmates who have intellectual disabilities, limited reading skills or who are blind or have low vision; and
- C. Providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Staff shall not use inmate interpreters, inmate readers, or other types of inmate assistants except in exigent circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of the staff's first-response duties as defined in this Policy and the PREA Coordinated Response Plan, or the investigation of the inmate's sexual abuse or sexual harassment allegations.
- D. The agency shall 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 for inmates with limited English proficiency. This will include steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively using any necessary specialized vocabulary.

Appropriate steps shall be taken with these inmates/detainees to have an equal opportunity in or benefit from Sheriff's Office efforts to prevent, detect, and respond to sexual abuse and sexual harassment. In addition, written material shall be provided in formats or through methods that ensure effective communication with inmates/detainees with disabilities, including intellectual disabilities, limited reading skills, or who are blind or have low vision, or are considered hearing impaired.

The Sheriff's Office shall take reasonable steps to ensure meaningful access to all aspects of the Sheriff's Office's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively.

The Sheriff's Office shall not rely on inmate interpreters, inmate readers or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. Policy 03-01-04 states: "Staff shall not use inmate interpreters, inmate readers, or other types of inmate assistants except in exigent circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties of staff under this Office's PREA Policy, or the investigation of the inmate's PREA allegations."

Per the PAQ, in the past 12 months, the number of instances where inmate

interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations: 0

Interviews with the PREA Coordinator and Booking staff indicate that TCSO ensures that any offenders with significant disabilities that required any special accommodations would be identified at intake and addressed accordingly. Staff would ensure the offender was able to fully participate and benefit from all aspects of the facility's efforts to prevent and/or respond to sexual abuse and harassment. Staff would communicate with the PREA staff if they are receiving an inmate with special needs and will make accommodations as necessary, including notification to other staff.

Interviews with staff, including supervisory staff and intake officers confirm that they have a process in place to ensure that all inmates, regardless of disability would have equal access to PREA information. The auditor observed PREA informational posters throughout the facility, in visible locations in both English and Spanish. Spanish is the prevalent non-English language in the area. During interviews with staff responsible for intake and classification, they ensured that inmates with disabilities were provided access to the PREA program. Staff indicated that these situations would be handled on a case-by-case basis.

Staff are generally aware of the availability of interpretive services for LEP inmates. The facility has the PREA brochure in both English and Spanish.

Offenders who are limited English proficient have access all aspects of the facility's efforts to prevent, detect and respond to sexual abuse and harassment, including providing interpreters. The Auditor determined through staff interviews that the TCSO has interpreters available for limited English proficient offenders through the use of an interpreter service, The LanguageLine. The scope of services includes both video and audio translation services in American Sign Language, Spanish, and other languages as needed.

Staff interviews revealed examples where interpreting services were used for LEP inmates in a variety of capacities, indicating that staff are aware of how to access this service and ensure that LEP inmates are able to fully participate in the PREA Program at the TCSO. The auditor reviewed the current contract renewal with The LanguageLine.

During the on-site portion of the audit, the Auditor was able to speak with inmates identified as blind or low-vision, inmates identified as cognitively disabled, inmates identified as deaf or hard of hearing and inmates identified as limited English proficient. During the targeted interviews, the inmates were able to answer the auditor's questions and were aware of PREA. The use of an interpreter was used for the LEP inmate as he could speak English, but not well. The auditor verified with the inmate his knowledge of the availability of interpreter services should he need them.

The facility offers the PREA Education video with closed-captioning. Staff can also

	<p>communicate with hearing impaired or deaf inmates through written communication. Per TCSO policy, the department has a TTY unit available to enable the hearing-impaired inmate to complete telephone calls during the booking process and at other times during their incarceration. Additionally, the TCSO will provide a qualified interpreter for hearing impaired inmates as soon as feasibly possible after incarceration in jail to interpret during the receiving screening, health evaluations, and classification process.</p> <p>TCSO has not had an incident where staff had to utilize any special accommodations for communication to address a PREA issue.</p> <p>The TCSO prohibits the use of inmate interpreters except in instances where a significant delay could compromise the offender's safety. Interviews with staff indicate that offenders are not and would not be used as interpreters. During the random staff interviews, no staff member said it was appropriate to use an inmate interpreter when responding to allegations of inmate sexual abuse. According to the targeted interview with the PREA Coordinator, as well as the PAQ, there were no instances of the use of an inmate interpreter even in exigent circumstances.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Hiring Background Packet</li> <li>4. Background Checks</li> <li>5. Review of recently promoted employee files from the past 12 months</li> <li>6. Reviews of randomly selected employee files</li> <li>7. Review of randomly selected volunteer files</li> <li>8. Background Information on Contract Employees hired within the last 12 months</li> <li>9. Interviews with PREA Coordinator, Investigator and Human Resources</li> </ol> <p>Findings:</p> <p>The TCSO does not hire any staff that has engaged in sexual abuse or harassment as stipulated in the standard. The language in the policy is written consistently with that in the standard.</p>

Travis County Sheriff's Office policy states the following:

- I. This Office shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who:
  - A. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or
  - 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 paragraph I.B of this section.
- II. This Office shall consider any incidents of sexual harassment in determining whether to hire, promote, or enlist the services of any contractor or volunteer who may have contact with inmates.
- III. Criminal background records checks shall be conducted 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.
- IV. All employees who may have contact with inmates shall be asked directly about previous misconduct described above (I.A-C) in this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. This Office shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.
- V. Material omissions regarding sexual misconduct, as described above (I.A-C), or the provision of materially false information, shall be grounds for termination.

Incidents of sexual harassment shall be considered on an individual basis. Consistent with Federal, State, and local law, the Sheriff's Office shall 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. All elements of the appointment and selection process shall be scored, evaluated, and interpreted in a fair and uniform manner. All personnel administering the tests, conducting interviews and background investigations shall be trained in these functions.

Also, unless prohibited by law, the agency shall 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

The Auditor reviewed the background packet and interview questions used by the TCSO and found that they are asking these questions during the interview process to determine if they are hiring anyone who has engaged in prohibited conduct. A "Disclosure of Sexual Misconduct Form" is included in the background packet. Staff indicated that the background investigator thoroughly vets any prospective employee and asks directly about previous misconduct as required by the standard. The document review on-site and interviews with the PREA Coordinator, Background

Investigator, Sheriff and Human Resources Manager confirmed that they have complied with this policy and no employee with such a history has been hired during the audit period. The disclosure form must be completed by both sworn and civilian staff, contract staff and volunteers.

The policy indicates that the TCSO will consider any instances of sexual harassment in determining whether to hire or promote anyone, or enlist the services of contractors who may have contact with inmates. Targeted interviews with the Background Investigator and Human Resources indicated that instances of sexual harassment would be a factor when making decisions about hiring and promotion. Every employee and contractor undergoes a background check and is not offered employment if there is disqualifying information discovered.

The PAQ indicates there have been 275 staff hired in the past 12 months who have had background investigations.

There is a written policy that requires inquiry into a promotional candidate's history of sexual abuse or harassment. Documentation reviewed supports compliance with the standard in accordance with agency policy. During the on-site portion of the audit, the Auditor reviewed files of employees that were hired in the last 12 months. All the employees' files contained background checks and pre-employment questionnaires where employees were asked the questions regarding past conduct and their answers were verified by a background investigation. The auditor also reviewed files of employees who were promoted in the last 12 months. The acknowledgement was completed for employees who had participated in the promotional process. Human Resources stated that employees are asked this information multiple times during the background process.

TCSO policy requires inquiry into the background of potential contract employees regarding previous incidents of sexual assault or harassment. Consistent with agency policy, all employees and contractors must have a criminal background records check prior to employment. Staff at the TCSO complete criminal background checks for all prospective applicants and contractors, prior to being offered employment. Staff verified this information in interviews discussing the background process. The Human Resource Manager and Background Investigator stated that the process is essentially the same for contract employees with respect to background checks and ensuring compliance with the standard. In addition, the TCSO uses a checklist for the background process, which verifies all steps have been completed, including the criminal history check. Per the PAQ, in the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates: 12

The auditor reviewed documentation of background checks for contract staff.

The Background Investigator stated that if a prospective applicant previously worked at another correctional facility, they make every effort to contact the facility for information on the employee's work history and any potential issues, including allegations of sexual assault or harassment, including resignation during a pending investigation. The auditor reviewed employee files for applicants who had previously

	<p>worked in correctional facilities and found documentation that these checks are being done.</p> <p>In accordance with the standard, TCSO policy the agency has a system is in place for otherwise capturing information for current employees. All employees are added to DPSFACTs System, and they get automatic "hits" when an employee comes into contact with LE.</p> <p>The TCSO asks applicants and contractors directly about misconduct as described in the standard on the personal history statement during the application process. These forms are maintained in their respective personnel files. The Auditor reviewed random files and verified these forms are being completed. Interviews with staff indicated that the forms are being completed as required by the standard and agency policy. TCSO policy stipulates a continuing affirmative duty to disclose any PREA related misconduct. All current and new staff are trained on the PREA policy, as well as annual refresher training. Training records verifying that employees acknowledge that they have read and understand the policy were reviewed by the auditor.</p> <p>In accordance with the standard, policy stipulates that material omissions regarding such conduct, or the provision of materially false information shall be grounds for termination. Interviews with staff verified that the TCSO would terminate employees for engaging in inappropriate behavior with inmates, upon learning of such misconduct.</p> <p>TCSO policy indicates that the facility shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer and a signed release of information. Staff indicated they would share information upon request from another facility regarding a former employee.</p> <p>The TCSO uses a disclosure/acknowledgement that asks the required questions of applicants to determine prior prohibited conduct. The hiring process includes requiring the investigator to make his/her 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.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. Schematic of facility</li> <li>3. Interviews with staff</li> <li>4. Observation of camera placement and footage</li> <li>5. Camera Listing</li> <li>6. Interviews with PREA Coordinator</li> </ol> <p>Findings:</p> <p>Per the PAQ, the TCJ is undergoing renovation due to old infrastructure issues. Per the PREA Coordinator, PREA and sexual safety is a consideration in the plans for remodel.</p> <p>According to the TCSO PAQ and targeted interviews with the staff, the TCSO has made upgrades to the camera system since their last PREA audit.</p> <p>A targeted interview with multiple supervisory staff indicates that they feel the camera coverage is sufficient. Per the staffing plan, TCSO deploys a wide array of video monitoring technology throughout the various jail buildings and sections, to assist staff in keeping inmates sexually safe. There are currently 1236 cameras located throughout the Corrections Bureau, with recording and playback capabilities, to monitor the sexual safety of the inmate population and assist in investigations of potential PREA incidents. Each year, facility leadership assesses all video systems and requests funding to upgrade, repair and add to existing cameras, monitors, computers and the wide array of additional equipment it takes to support the technology. During 2025 new cameras were added throughout the facility, both downtown and at Del Valle.</p> <p>While the staff feels that the camera coverage is very good, they constantly do camera reviews and would update as needed. Staff review the cameras regularly to ensure proper operation and will ensure any maintenance required.</p> <p>Per interviews with the Captains and PREA Coordinator, when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, TCSO considers how such technology may enhance TCSO's ability to protect inmates from sexual abuse. The auditor reviewed camera placement during the on-site review, as well as camera monitors and views of areas in the facility, and a listing of all cameras.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## Auditor Discussion

Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. TCSO Coordinated Response Plan - TCCC
4. TCSO Coordinated Response Plan - TCJ
5. Evidence Protocol
6. Contract with Safe Alliance
7. Review of incident logs

Interviews with the following:

- PREA Coordinator
- Investigator
- Safe Alliance
- Medical personnel

Findings:

The Travis County Sheriff's Office is responsible for conducting both administrative and criminal sexual abuse investigations. Policy 03-05-09 states, "I. The shift supervisor where the victim is housed is responsible for ensuring the incident is appropriately investigated and documented both administratively and/or criminally. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; investigators shall interview alleged victims, suspected perpetrators, and witnesses, and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

All credible allegations of forcible sexual assault will be reported as soon as possible to preserve physical evidence and thoroughly and promptly investigated in conjunction by the Sheriff's Office. The TCSO is responsible for administrative and criminal investigations.

The facility follows a uniform protocol for investigating allegations of sexual abuse that maximizes the possibility of collecting usable evidence and trains facility staff who may be first responders in this protocol. Interviews with staff indicate that they are trained and familiar with what to do if they are the first responder to a sexual assault. The evidence protocol is developmentally appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents."

CID would be contacted to investigate incidents that occur that are criminal in nature, including those related to PREA violations. The TCSO will conduct sexual abuse investigations in accordance with PREA standards and follow the nationally accepted protocols for Sexual Assault Medical Forensic Exams published by the USDOJ. According to interviews with staff, a designated investigator and the PREA

Coordinator, there are multiple investigators trained to conduct sexual assault investigations. If not already aware, the PREA Coordinator would be notified. The facility provided a copy of the evidence guide for review.

Per policy, all victims of sexual abuse shall be offered a forensic medical exam, without financial cost to the victim. The Coordinated Response Plan details the process.

a. The Shift Supervisor where the victim is housed is responsible for ensuring the incident is appropriately investigated both administratively and criminally, as applicable.

1) The Shift Supervisor will conduct the PREA administrative investigation, including the PREA Investigation Electronic packet and PREA Jail Incident in Tiburon.

2) A Criminal Incident Division (CID) Detective will conduct the criminal investigation, should the victim choose to file a criminal offense report.

b. Unless the victim refuses, the Shift Supervisor will notify Victim Services (through dispatch).

c. The Shift Supervisor will have the inmate victim escorted to the Health Services Building (HSB) Clinic for stabilization and a wellness check.

d. If no qualified medical practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical practitioners.

e. The inmate victim will remain at the HSB Clinic awaiting arrival of a Sexual Assault Nurse Examiner (SANE) for a Sexual Assault Forensic Exam (SAFE), if applicable. If the SAFE needs to be postponed for any reason (i.e. a SANE needs to be located) the inmate may return to their unit, as long as they are separated from the perpetrator.

The inmate victim should be reminded of what actions destroy evidence.

f. The alleged abuser (inmate) will be isolated pending further investigation.

g. Victim Services personnel will meet with the victim to discuss reporting options and will assist with arrangements for a SAFE (if applicable).

h. Victim Services will discuss the SAFE with the inmate, explaining the purposes and procedures involved, as well as informing the inmate that treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or participates in any investigation arising out of the incident.

Victim Services personnel will notify the shift supervisor if the victim elects to file a criminal offense report.

1) If the victim wants a SAFE, the shift supervisor will notify the duty officer.

2) If the victim wants a SAFE and wants to pursue criminal charges, the Shift Supervisor will then notify the on-call CID Supervisor (through dispatch) to begin the criminal investigation and approve a SAFE via the Sexual Assault Reporting SOP.

3) If the victim wants a SAFE but does not want to pursue criminal charges, the Shift Supervisor will follow Sexual Assault Reporting SOP (HB 616) for PREA Cases. The Shift Supervisor will complete a Law Enforcement Request for Sexual Assault Exam form and approve or deny the request.

4) Sexual Assault Forensic Exams (SAFE) must be done within 120 hours of the alleged incident. Staff will calculate the hours since the alleged incident and adjust accordingly.

5) If the victim does not want a forensic exam and does not want to pursue criminal

charges, the Shift Supervisor will begin the administrative investigation.

i. The Sexual Assault Nurse Examiner (SANE) will report to the TCCC medical clinic to conduct the SAFE.

1) Any evidence collected by the SANE will be picked up by Crime Scene/Evidence personnel. For Non-Reported Sexual Assaults exams, the SANE is responsible for the proper storage of the kit/evidence.

2) After the SAFE is completed, the transporting officer will return the inmate to TCCC and provide any discharge or other medical paperwork to Medical Services.

The agency has space and tools dedicated to forensic examinations onsite at TCCC Del Valle. For Inmates housed at TCJ and TCCB, transportation is arranged to TCCC Del Valle but it is not an outside facility.

Examinations will be conducted by qualified SANE/SAFE experts in accordance with the guidelines of the National Protocol for Sexual Assault Medical Forensic Examinations from the Department of Justice. Persons performing these exams will be Registered Nurses licensed by their respective State Board of Nursing and possess training and/or certification in the Sexual Assault Nurse Examination or a Physician with training specific to the sexual assault medical forensic examination. The availability of these services was confirmed by the Auditor with the Medical staff. They indicated that there was a SANE/SAFE nurse available 24 hours per day and 7 days per week and there would be no charge to the victim for this exam.

The auditor reviewed the contract with Safe Alliance. Per the contract:

Under the terms and conditions of this Agreement, each forensic nurse will conduct sexual assault examinations as requested and directed by the Travis County Sheriff's Office (TCSO).

1. Procedures. TCSO will approve the need for an exam and contact Contractor via phone. Contractor will staff this phone line twenty-four (24) hours a day, seven (7) days a week, including weekends and holidays. A Sexual Assault Nurse Examiner (SANE) will be dispatched to the agreed upon location off TCSO property. The location of the examination will be determined by the survivor to the extent that is possible given clinical and practical limits of the case. Non-Emergency Department Sexual Assault Examinations will be conducted on site at The SAFE Alliance. The services pursuant to this Agreement are forensic exams in which the survivor does not require emergency department medical care. Contractor will staff and maintain a twenty-four (24) hour, seven (7) days a week exam site located at their main campus at 4800 Manor Rd., Austin, TX 78723. Emergency Department Sexual Assault Examinations will be conducted at area hospitals or facilities in which The SAFE Alliance has established a written Business Associate Agreement, and Contractor shall provide a copy of the written Agreement to the County in advance of performance of services. Emergency Department Sexual Assault Examinations are services in which the survivor is in need of emergency medical care.

The TCSO reported on the PAQ there have been no allegation or incidents of sexual abuse requiring a forensic exam be conducted. This was confirmed onsite by staff interviews and reviewing the investigative logs.

TCSO policy indicates they will make a victim advocate from a rape crisis center available to an inmate victim of sexual assault upon request. The TCSO has an MOU with Safe Alliance to provide services to the facility. They are available to serve as a victim advocate to victims of sexual assault at the TCSO. They will provide, upon request of the victim of the victim and in accordance with the SANE/SAFE Nurse, support, advocacy, and any other appropriate services to victims of sexual assault referred by TCSO. The auditor verified the availability of these services with the PREA Coordinator and Safe Alliance.

Per the MOU, SAFE Alliance agrees (in part) to:

1. Staff a hotline seven days per week, including weekends and holidays, to provide crisis intervention services to inmate victims of sexual abuse in TCSO custody.
2. Review TCSO PREA Policies, procedures and training concerning the prevalence and dynamics of sexual abuse in a confinement setting, and TCSO's response to such.
3. Work with TCSO officials to obtain security clearance for designated Advocates (when and if available) and follow all institutional guidelines for safety and security.
4. Maintain confidentiality as outline by your agency standards.
5. Inform the designated Travis County Jail supervisor of any emergency mental health needs of the inmate that are related to sexual assault or abuse, with proper consent, and without disclosing anything beyond the immediate concern. Information/ concerns from inmates not related to sexual assault/abuse will not be forwarded to TCCC staff.
6. Obtain the inmates' consent and a verbal release of information prior to contacting TCSO or other third parties about any fears or concerns the inmate has related to his/ her safety or well-being. Use professional discretion and follow agency standards and applicable laws when reporting concerns to TCSO staff without the inmate's consent.

Is there were an occasion that a victim advocate from Safe Alliance was not available to provide victim advocate services, the facility would provide a qualified staff member from a community-based organization or a qualified agency staff member. The Mental health professional is able to offer services, if needed.

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

115.22	Policies to ensure referrals of allegations for investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Relied upon to make Compliance Determination: <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> </ol>

3. PREA Case Log

4. Review all investigative files for allegations of sexual abuse or harassment for the past 12 months

5. Website

Interviews with the following:

- PREA Coordinator
- PREA Compliance Managers
- Investigative Staff
- Random Inmates

Findings:

The TCSO policy is written in accordance with the standard and requires that an investigation is completed for all allegations of sexual abuse and harassment. Policy also dictates that allegations are referred for a criminal investigation, if warranted.

The PREA Coordinator, supervisors and Investigators work very closely together to ensure that all allegations of sexual abuse and harassment are investigated promptly and thoroughly. If an offender alleges a sexual assault or sexual harassment has taken place, the staff member to whom the allegation was reported will notify the supervisor, who will take the initial report and refer it for further action and investigation. The Investigator coordinates with the PREA Coordinator to determine the course of action.

The TCSO policy is posted on the website under the PREA section.

Targeted interviews with Investigators, PREA Coordinator and PREA Compliance Managers verified that all allegations of sexual abuse or harassment are investigated promptly and thoroughly. They described the process for investigations, which is a collaborative approach. According to the interviews, once an allegation is received, it is referred for investigation based upon the type of allegation. In the case of a sexual abuse allegation, the first responders and supervisory personnel would initially take action to separate the alleged victim and perpetrator and takes steps to preserve any evidence. The on-duty supervisor would brief the PREA Coordinator and depending on the situation, initiate a call to CID to begin a criminal investigation. Essentially, all reports of sexual abuse or harassment are evaluated by the first responders and supervisors in coordination with the PREA Coordinator and a determination is made whether to initiate a criminal investigation. If there is no exigency and no evidence that a crime has occurred, the facility initiates an administrative investigation. The incident is investigated and if during the investigation, it is determined that there is evidence to support a crime was committed, the PREA Coordinator will consult with CID as necessary. If there is no evidence that a crime was committed, then the investigation is completed as an administrative investigation by the facility investigator.

Interviews with staff indicate they are aware of their responsibility to investigate every allegation, refer the allegation if it involves criminal behavior and notify the PREA Coordinator of all allegations.

	<p>The TCSO reports there have been 235 allegations of sexual abuse or harassment in the past 12 months. Per the PAQ, the number of allegations resulting in an administrative investigation: 235</p> <p>Per the PAQ, in the past 12 months, the number of allegations referred for criminal investigation: 2</p> <p>A review of the investigative files indicate that the allegations were promptly and thoroughly investigated.</p> <p>TCSO policy requires that all sexual assault allegations that involve evidence of criminal behavior be referred for criminal prosecution. Documentation of such is contained in the investigative reports, which the Auditor reviewed.</p> <p>The auditor reviewed the TCSO website and the agency policy is posted and publicly available. During an interview with an investigator, he verified that investigations that revealed criminal behavior would be referred for prosecution. The PREA Coordinator confirmed this information.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. COBRA PREA Training and Handouts</li> <li>4. New Hire PREA Training</li> <li>5. Training Guide</li> <li>6. Review of Training Files</li> <li>7. Interviews with Random Staff, PREA Coordinator, Training Coordinator</li> </ol> <p>Findings:</p> <p>The TCSO policy is written in accordance with the standard and mandates training for all Sheriff's Office staff on required topics and elements of the standard. Policy requires that all employees, contractors, and volunteers who have contact with inmates receive training. According to the policy, mental health and medical personnel receive specialized training. The training is tailored for both male and female inmates, as the facility holds both.</p>

Per the PAQ, TCSO employees receive PREA training multiple times.

1. New Employee Orientation (NEO);
2. COBRA (Cadets);
3. FTO - Main Sign-Offs Tab;
4. NIC PREA: Your Role in Responding to Sexual Abuse

Policy 03-05-09 states:

I. Employee Training:

A. All employees who may have contact with inmates shall be trained on:

1. The Sheriff's Office's zero-tolerance policy for sexual abuse and sexual harassment.
2. How to fulfill staff responsibilities for 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 reactions 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.

B. Training shall be further tailored to the gender of inmates at the employee's facility, through the Field Training Program of that assigned section. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. Each facility has trained Field Training Officers who will conduct the training.

C. Each employee shall receive refresher training every two years to ensure all employees know the Sheriff's Office's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the Sheriff's Office shall provide refresher information on current sexual abuse and sexual harassment policies.

D. All PREA training shall be documented and maintained, through employee signature or electronic verification, to confirm that the employee understood the training they received.

The facility provides PREA training every two years to each employee to ensure they remain up to date on the TCSO policies and procedures regarding sexual abuse and harassment.

The Auditor reviewed the training curriculums and verified they included all information and each element required by the standard. The Auditor reviewed the training rosters to verify and ensure all employees are receiving the training. During the pre-audit period the Auditor reviewed the training documentation submitted by the facility. In addition, during the on-site portion of the audit, the auditor verified the training of staff, which includes contractors, by reviewing training logs for all

	<p>employees who had received training for the current audit cycle. The computerized rosters for training are maintained by the Training Coordinator to verify the training hours.</p> <p>New staff are given PREA training during their orientation before assuming their duties and sign a verification acknowledging they have received the information. During interviews with the PREA Coordinator and Training staff, they confirmed that no employee is permitted to have contact with inmates prior to receiving PREA training during orientation.</p> <p>The Auditor reviewed the curriculums, PowerPoint and rosters to verify compliance.</p> <p>Based upon the documentation provided by the training coordinator, all active employees at TCSO have completed the required training.</p> <p>The Auditor conducted formal and informal interviews with random and specialized staff. All staff interviewed indicated that they had received training and were able to articulate information from the training. During the staff interviews, all the random employees recalled having PREA training and were able to articulate information from the training. Many staff also stated that the PREA officers would send out information and refreshers via email. Staff appear to understand their responsibilities regarding the standards. The staff are appropriately trained, and all documentation is maintained accordingly.</p> <p>PREA training is conducted every two years as required by the standard.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Training rosters</li> <li>4. New Contractor PREA Training</li> <li>5. Review of Training Files</li> <li>6. Volunteer Training Packet</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> </ul>

- Contract Staff
- Training Coordinator

Findings:

The TCSO policy is written in accordance with the standard and mandates training for all Sheriff's Office staff on required topics and elements of the standard. The policy requires that all staff receive training regarding PREA. This training is required to be completed in person prior to contact with any inmates. The training is tailored to both male and female inmates at TCSO, as the facility holds both.

Contract staff complete the training and sign an Acknowledgment indicating their receipt of and understanding of the PREA training. In addition, contract and volunteer staff sign a Volunteer/Contractor Agreement which includes information related to PREA, and the consequences of failing to comply with the rules and regulations of the Sheriff's Office.

Policy 03-05-09 states: A. All volunteers, contractors and interns who have contact with inmates shall be trained on their responsibilities under the Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

B. The level and type of training provided to volunteers, contractors and interns shall be based on the services they provide and level of contact they have with inmates, but all volunteers, contractors and interns who have contact with inmates shall be notified of this Office's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

C. All PREA training shall be documented and maintained to confirm that volunteers, contractors and interns understand the training they receive.

The Auditor reviewed the training curriculum and verified it included all information required by the standard. The Auditor reviewed the training rosters, as well as random training files to verify and ensure all contracted employees are receiving the training. New contractors and volunteers are given PREA training during their orientation before assuming their duties and sign a verification acknowledging they have received the information. During the document review, the auditor was able to verify that the contractors who had been trained were required to sign an acknowledgement that they had received and understood the PREA training. The auditor reviewed the files of newly hired contract employees and verified that the signed training acknowledgement form is retained in their files. In addition, during targeted interviews with Training staff, they verified that training acknowledgements were retained in the files.

The Auditor conducted a formal interview with contracted staff. The contract staff told the auditor that they recalled having the PREA training and knew of the TCSO's zero-tolerance policy against sexual abuse and harassment. In addition, they could articulate what to do if an inmate reported to them. When asked what the consequence would be if they violated the PREA policy, they stated they would be removed from the facility. The contract staff were knowledgeable regarding the PREA information they had received. Staff appear to understand their responsibilities

	<p>regarding the standards.</p> <p>The TCSO is providing training in accordance with the standard. The documentation is maintained accordingly.</p> <p>The auditor conducted an interview with a volunteer. The volunteer was able to articulate the zero-tolerance policy and what to do if an inmate reported an allegation of sexual harassment or sexual assault. The auditor reviewed the training curriculum for volunteers and found that the information provided meets the requirements of the standard. The auditor reviewed acknowledgement forms signed by volunteers verifying receipt and understanding of PREA training.</p> <p>The facility reports on the PAQ that there are 304 volunteers and contractors who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.</p> <p>Volunteers and contractors all receive PREA training as required by the standard and RCO policy. Documentation of the training is maintained by the facility.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. PREA Brochure</li> <li>4. Review of inmate training documentation</li> <li>5. Inmate Handbook</li> <li>6. Sampling of inmate files comparing intake date, the date of initial screenings, and the date of comprehensive screening</li> <li>7. Inmate Education and acknowledgement</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• PREA Compliance Managers</li> <li>• Random Inmates</li> <li>• Booking Staff</li> </ul>

Observations of the Following:

- PREA informational Posters throughout the facility in inmate housing and common areas
- Inmate Intake Process

Findings:

The TCSO policy is written in accordance with the standard. In accordance with policy, during the booking process, all inmates will be informed of the Sheriff's Office, zero-tolerance policy regarding inmate sexual abuse, sexual harassment and non-coercive sexual contact between inmates. The PREA brochure, inmate handbook, tablet and kiosk information and informal posters, provide offenders with information regarding sexual abuse and assault, the agency's zero tolerance policy and how to report incidents of sexual abuse or harassment.

TCSO policy 03-05-09 states:

- A. During the intake process, inmates shall receive information explaining the Sheriff's Office's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse and sexual harassment.
- B. Within 30 days of intake, comprehensive education shall be given to inmates either in person or through video regarding:
  1. Their rights to be free from sexual abuse and sexual harassment.
  2. To be free from retaliation for reporting such incidents.
  3. Agency policies and procedures for responding to such incidents.
- C. Inmate education shall be provided in formats accessible to all inmates, including those with limited English proficiency, who are deaf, visually impaired, or otherwise disabled, and
- D. Documentation of inmate participation in these education sessions shall be maintained in the inmate's incarceration file.
- E. Inmates shall be shown the PREA Inmate Education Video in Central Booking Holding and, additionally, three times a week in housing units, ensuring that inmates who have been recently transferred between the downtown and Del Valle facilities, have been given the inmate education described in this Policy. A notation shall be made in the electronic logbook with each showing of the video.
- F. In addition to providing education, the key information shall be continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

The TCSO PAQ reported that during the last year 35592 offenders were committed to the facility and given PREA information at the time of intake, in accordance with the standard. Targeted interviews with multiple staff indicated that this information is communicated to the offenders verbally and in writing upon arrival at the facility.

The PREA education video plays continuously in the booking area, in Spanish and English, with subtitles and sign language. Additionally, the video is played at set times on inmate's TVs in housing areas and is available on the tablets. According to the PAQ, 17750 inmates were at the facility for 30 days or more and given the comprehensive PREA education. However, most all inmates received at the TCSO

receive the comprehensive education as this is done during their booking process.

The auditor observed PREA signage in all facility locations, and notification of the agency's zero tolerance policy. Staff told the auditor that they explained the agency's zero tolerance policy regarding sexual abuse and harassment, and they explain to the newly committed inmates that they could report any instances of abuse or harassment to staff and use the inmate telephone system to report abuse to the listed hotline.

Interviews with intake staff verified that inmates are given PREA orientation, including those transferred from another facility. Further questioning revealed that inmates who were LEP would be provided the orientation using a language telephone interpreter service or a Spanish speaking staff would be utilized, if available. For offenders that are visually impaired, a staff member would read the information to the offender. The video also has printed subtitles for the hearing impaired. Staff would assist any other disabled or impaired inmates that needed assistance, such as intellectually limited inmates. Information in multiple formats was available throughout the facility. Targeted interviews with staff indicated that the facility will make needed accommodations for identified inmates with disabilities. The Auditor observed PREA informational posters in all offender housing areas, intake, and public areas. The PREA Coordinator reviews all intakes and will identify and address any inmate special needs with respect to participating in the PREA Program and ensuring access to all information.

Inmate interviews revealed that most inmates remembered receiving information about the agency's zero tolerance policy and how to make a report of sexual abuse. All inmates interviewed stated they are aware of PREA and could articulate at least one way how to report.

The comprehensive education is accomplished through the use of the PREA education video. This is documented on the PREA Education form (PRED), which is kept in the inmate record to verify receipt of the training. In addition, this information is contained in the inmate handbook which is given to each inmate and acknowledged in writing. Offender interviews indicated that they were receiving the training.

The auditor reviewed a sampling of 40 random inmate files to verify that all of them had received the comprehensive education within the 30-day timeframe. In addition, the auditor followed a newly received inmate through the booking process and observed the staff reviewing the PREA information and brochure.

The file contained documentation of the initial inmate PREA orientation and receipt of the information at the time of admission, as well as the comprehensive education. This verified what the interviews revealed, what was required by policy and what was reported in the submitted PAQ. Interviews with staff and offenders verified that offenders are receiving the initial and comprehensive training as required.

All current offenders have received PREA training. Offender interviews indicate that the majority remember receiving information upon arrival and viewing the orientation video. They have an awareness of PREA information and how to report.

	<p>As required by the standard, policy provides for education in formats accessible to all inmates. There are Spanish versions of all materials. For offenders that are visually impaired, a staff member would read the information to the offender. As indicated in agency policy, all other special needs would be handled in coordination with the PREA Coordinator on a case-by-case basis. There have been no instances of the need to accommodate special needs inmates during this audit period.</p> <p>Information in multiple formats was available throughout the facility. The Auditor observed PREA informational posters in all offender housing areas, intake, and medical. The inmate handbook is available and provided to all offenders.</p> <p>Inmates receive PREA information immediately upon arrival. The PREA information and education is available in Spanish, with the capability of translating to other languages as needed. All other special need are addressed as needed by the PREA Coordinator.</p> <p>After a review, the Auditor determined that the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Review of Training Materials</li> <li>4. Review of Training Documentation</li> <li>5. Review Training Curriculum for Specialized Training</li> <li>6. Review of Training Certificates for Investigators</li> <li>7. Interviews with PREA Coordinator &amp; Investigative Staff</li> </ol> <p>Findings:</p> <p>Agency policy is written in accordance with the standard. Policy states that:</p> <p>A. In addition to the general training provided to all employees, investigators (Corrections Sergeants, IA Detectives and Major Crimes Detectives) shall receive specialized training for conducting such investigations in confinement settings.</p> <p>B. Specialized training shall include 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.</p>

	<p>C. This Office shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.</p> <p>Investigations of sexual misconduct, sexual contact, sexual abuse, and sexual harassment shall be conducted by an investigator who has experience and training in sexual abuse investigations and appropriate and effective interview techniques. These techniques include interviewing for 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.</p> <p>TCSO investigators conduct administrative investigations and some criminal investigations depending on the nature of the allegation. The Auditor verified the training for the agency investigators. The training included all mandated aspects of the standard, including Miranda and Garrity, evidence collection in a correctional setting, as well as the required evidentiary standards for administrative findings. Per a targeted interview with the PREA Coordinator, this training is accomplished through the online NIC Investigator Training. During a targeted interview with one of designated investigators for the facility, he was able to articulate the aspects of the training received. He appeared knowledgeable in the training he had received, as well as conducting sexual assault investigations. He indicated that, if in the course of the investigation, it appeared that the conduct was criminal in nature and there could be criminal charges involved, they would call CID.</p> <p>The Auditor was provided and reviewed a master list of trained investigators for the TCSO. There are 50 trained investigators listed for TCSO. The Auditor reviewed the training records for the agency investigators and verified that they had received the specialized training. Per the PAQ and PREA Coordinator, only those trained can investigate PREA allegations.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Review of Training Materials</li> </ol>

4. Review of Training Documentation

5. Interviews with Training Coordinator and Medical/Mental Health Staff

Findings:

TCSO policy requires that all staff members receive PREA training in accordance with standard 115.31. Further, the policy requires that all part- and full-time mental health and medical staff members receive additional specialized training.

Policy 03-05-09 states:

A. All full- and part-time medical and mental health care practitioners who work regularly in TCSO Jail facilities shall be trained in:

1. How to detect and assess signs of sexual abuse and sexual harassment; and
2. How to preserve physical evidence of sexual abuse; and
3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

B. If medical staff employed by this Office conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.

C. All such training shall be documented and maintained to confirm that medical and mental health practitioners have received the training referenced.

D. Medical and mental health care practitioners shall also receive the training mandated for employees under PREA Standard §115.31 or for contractors and volunteers addressed above, depending upon the practitioner's status.

The TCSO employs medical and mental health providers. All the medical and mental health staff received the specialized training as evidenced by documentation provided by the training staff and reviewed by the auditor. During the on-site portion of the audit, the auditor reviewed the training logs provided by the staff and verified that all the current employees had received the required training. During targeted interviews with the HSA and other medical and mental health staff, they stated they received PREA training upon orientation. In addition to the PREA training required by the TCSO, all medical and mental health staff complete additional training related to healthcare and PREA, which is done through the NIC. The course, Medical Health Care for Sexual Assault Victims in a Confinement Setting, is completed by all medical and mental health staff.

Per the PAQ, there are 132 medical and mental health care practitioners (Medical - 80, Mental Health - 52) who work regularly at this facility who received the training required by TCSO policy.

A targeted interview with the training coordinator verified that every employee is required to participate in PREA training in accordance with 115.31 and that training is documented. In addition, medical and mental health staff receive specialized training annually that covers all aspects of the standard. The auditor verified this training had been completed.

The staff of the TCSO do not perform forensic medical examinations for victims of

	<p>sexual assault. Forensic medical exams are conducted by Safe Alliance.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.41</b>	<b>Screening for risk of victimization and abusiveness</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO PREA Federal Standards and Compliance</li> <li>4. Review of Risk Assessments - TCSO Screening Form</li> <li>5. 30 Day Reassessment Logs</li> <li>6. Sampling of Random Inmate Files</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• Random Inmates</li> <li>• Classification Staff</li> <li>• PREA Compliance Managers</li> </ul> <p>Observations of the Following:</p> <ul style="list-style-type: none"> <li>• Inmate Intake Process</li> </ul> <p>Findings:</p> <p>According to TCSO Policy, all inmates shall be assessed upon their admission to the facility. The policy is written in accordance with the standard. Policy 03-05-09 states: II. To reduce and prevent sexual abuse and sexual harassment of inmates, all inmates shall be assessed during an intake screening and upon transfer to another facility, within 72 hours of arrival at the facility for their risk of sexual abusiveness toward other inmates and sexual victimization by other inmates. Housing, bed, work, education, and programs decisions are then made with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. All inmates shall be reassessed within 30 days of their arrival, for their risk of sexual abusiveness and sexual victimization based upon any additional relevant information received by the facility since the intake screening in accordance with the Inmate Classification Plan Policy.</p> <p>The TCSO PREA Federal Standards and Compliance policy states:</p>

I. Screening for risk of victimization and abusiveness—[§115.41]

A. All inmates shall be assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.

[§115.41(a)]

B. Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

[§115.41(b)]

C. Such assessments shall be conducted using an objective screening instrument.

[§115.41(c)]

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 purposes.

[§115.41(d)]

E. The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to this Office, in assessing inmates for risk of being sexually abusive. [§115.41(e)]

F. Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, this Office will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. [§115.41(f)]

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. [§115.41(g)]

H. Inmates may not be 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. [§115.41(h)]

I. This Office 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. [§115.41(i)]

During the site review, the auditor was able to follow an inmate through the admission and screening process. During the site review, the auditor spoke with multiple staff who explained the initial intake process. Upon arrival at the facility, inmates are informed of their right to be free from sexual abuse and harassment as well as the agency's zero-tolerance for sexual abuse and harassment and how to report instances of sexual abuse or harassment. Interviews with the PREA

Coordinator and Classification staff verified that within 72 hours of admission, all inmates are screened for risk of sexual abuse victimization and the potential for predatory behavior. This is completed by the staff on duty when the inmate is received and is completed upon arrival at the facility. During interviews with random inmates, most remember their initial screening and remember being asked some PREA related questions during their admission.

The TCSO does not typically hold offenders solely for civil immigration purposes. The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to TCSO, in assessing inmates for risk of being sexually abusive. According to the PAQ and TCSO Policy, the PREA screening instrument shall include 10 individual elements. Upon review of the screening instrument, the auditor determined that the screening instrument included all of the required elements.

According to the PAQ, 100% of the 17550 inmates 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 and who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility.

An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. The PREA Coordinator stated that a reassessment is completed any time there is an incident and/or based on a referral from a staff member. Interviews with Classification staff also indicated that an inmate's risk level is reassessed based upon a request, referral or incident of sexual assault. The auditor reviewed examples of risk assessments completed as a result of a PREA allegation.

Inmates are asked their sexual orientation in addition to the reviewing staff's perception. Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. Policy states inmates shall not be disciplined for refusing to answer questions or for not disclosing complete information.

According to the PAQ, 100% of the 5415 inmates 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 and 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. This is completed by the PREA Compliance Managers. They have a tracking spreadsheet and go to the inmate's location to complete the re-assessment within 30 days. Interviews with the PREA Compliance Managers verified this process. Inmate interviews also revealed that these are being completed as required.

TCSO has implemented appropriate controls on the dissemination within TCSO 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. All files are controlled by supervisory personnel and maintained in each

	<p>inmate’s electronic classification file. Policy states that information obtained from the inmate pursuant to the intake screening shall remain need to know in order to ensure that sensitive information is not exploited to the inmate’s detriment by staff or other inmates. Additionally, 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, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.</p> <p>The Auditor interviewed staff who complete the screenings. The staff indicated that the risk screening is completed within 72 hours. There is limited access to the PREA risk assessment. This screening is used for housing and program decisions and referrals. The auditor reviewed this information and verified it is maintained electronically with limited access. The auditor was provided a copy of and reviewed the screening form.</p> <p>Targeted interviews with staff, as well as the PREA Coordinator verified that risk assessments are performed within 72 hours of intake. The questions are asked and the answers are recorded by the staff on the risk assessment form. There are areas on the form that allows for the inclusion of additional details related to the question, if additional data needs to be documented.</p> <p>The auditor reviewed random inmate files and looked at their intake records and risk screenings in order to compare the admission date and the date of admission screening. All of the randomly selected files had received risk screenings within 72 hours of intake. All of the files also reflected re-assessments completed within 30 days as required.</p> <p>TCSO policy stipulates that no inmate shall be disciplined for refusing to answer or disclose information in response the risk assessment questions. According to targeted interviews with the staff, there have been no instances of inmates being disciplined for refusing to answer screening questions.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective action: None</p>
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<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> </ol>

2. TCSO Policy 03-05-09

3. TCSO PREA Federal Standards and Compliance

4. Review of Screenings

Interviews with the following:

- PREA Coordinator
- PREA Compliance Managers
- Classification Staff

Observation of the following:

- Site review of inmate housing units

Findings:

The TCSO policy requires that screening information from the PREA risk assessment is used in making housing, bed work, education, and programming assignments.

Policy 03-05-09 states: II. To reduce and prevent sexual abuse and sexual harassment of inmates, all inmates shall be assessed during an intake screening and upon transfer to another facility, within 72 hours of arrival at the facility for their risk of sexual abusiveness toward other inmates and sexual victimization by other inmates. Housing, bed, work, education, and programs decisions are then made with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. All inmates shall be reassessed within 30 days of their arrival, for their risk of sexual abusiveness and sexual victimization based upon any additional relevant information received by the facility since the intake screening in accordance with the Inmate Classification Plan Policy.

TCSO PREA Federal Standards and Compliance policy states:

A. This Office 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. [§115.42(a)]

B. This Office shall make individualized determinations about how to ensure the safety of each inmate. [§115.42(b)]

The Classification staff is responsible for accurately using the risk assessment tool 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. All inmates shall be classified prior to being moved into their final housing assignment. The Classification Division will make individualized determinations about how to ensure the safety of each inmate.

When an inmate is determined to be high risk for victimization or high risk for abusiveness, it is the responsibility of the staff member conducting the screening to enter the results into the PREA Risk Assessment and inform the PREA Coordinator. An inmate that is determined to be at high risk for victimization will be initially kept in a separate cell until the PREA Coordinator and Classification Supervisor review the screening. The inmate will not be placed in the same cell or general area as an

	<p>inmate that has been determined to be high risk for abusiveness. When housing inmates, Classification staff use the risk assessment with the goal being to keep inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>The staff look at the totality of all the screening information to determine the best housing location.</p> <p>It is the responsibility of the classification staff to check each inmate being placed in a job that has been determined as an area where there should not be victims and abusers working together unless under direct supervision. All program, education and work areas are staffed at all times when in operation. All areas/rooms in the kitchen are monitored by camera. Work supervisors would be notified of any potential conflicts. PREA risk assessments are checked to ensure no potential conflicts exist.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Memo from PREA Coordinator</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• Supervisors and Staff Responsible for Supervising Inmates in Restrictive Housing</li> </ul> <p>Findings:</p> <p>In accordance with agency policy, TCSO does not place inmates who are at high risk for sexual victimization in restrictive housing unless alternatives have been considered and are not available. Agency policies are written in accordance with the standard and cover all mandated stipulations.</p> <p>Policy 03-04-01 states:</p> <ol style="list-style-type: none"> <li>I. Inmates at high risk for sexual victimization and inmates who have suffered sexual abuse 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</li> </ol>

there is no available alternative means of separation from likely abusers. If such an assessment cannot be conducted immediately, the inmate may be held in involuntary segregated housing for no longer than 24 hours while the assessment is completed.

a. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities, is restricted, the following shall be documented in the form of an informational:

- i. The opportunities that have been limited;
- ii. The duration of the limitation; and
- iii. The reasons for such limitations.

b. Inmates assigned involuntary segregated housing for these purposes shall only be assigned as such 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.

c. If an involuntary segregated housing assignment is made as stated above, the following shall be clearly document:

- i. The basis of concern for the inmate's safety; and
- ii. The reason why no alternative means of separation can be arranged.

d. Every week, the inmate shall be afforded a review to determine whether there is a continuing need for separation from the general population.

In interviews with staff, they stated they would not place an inmate in segregation for reporting sexual abuse or assault. Staff indicated they would not ordinarily place a sexual assault victim in segregation unless he had requested it. Staff explained that other alternatives are explored and segregation is utilized as a last resort. The Auditor was informed of and observed several areas in the facility to place sexual abuse victims to ensure they are protected from abusers without having to place the victim in segregated housing.

Per the PAQ, the 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: 1

Per the PAQ, the 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: 0

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, the 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: 1

(The inmate was in segregated housing pending completion of assessment)

The auditor reviewed all the TCSO restrictive housing areas and through informal discussions with supervising staff, no staff indicated that inmates were assigned to restrictive housing because of their sexual vulnerability. Staff indicated that if an inmate that made an allegation were to be held in restrictive housing, it would be very briefly until other housing was arranged or the initial investigation was complete.

	<p>Staff indicated that an inmate identified as high risk would be moved to another housing location and not placed in segregation unless it was a temporary placement to keep the inmate safe until the investigation was complete, or unless the inmate requested it. Staff indicated that there was sufficient space and housing units to find a suitable place for an otherwise orderly inmate.</p> <p>The agency policy states that if inmates were placed in restrictive housing for involuntary protective purposes, they would be permitted programs and privileges, work and educational programs and any restrictions would be limited. Further, the policy stipulates that such an involuntary housing assignment would not normally exceed 30 day and such a placement would be documented and include the justification for such placement and why no alternative can be arranged. According to the policy, if an inmate is confined involuntarily under these circumstances, the facility shall review the continuing need for placement.</p> <p>Staff are aware of their responsibilities regarding this standard, including the need for a review every 30 day. There have been no instances that required action regarding this standard.</p> <p>During the on-site portion of the audit, the auditor reviewed all the restrictive housing areas and had informal discussions with both inmates and staff. As verified by targeted interviews with staff, the auditor did not identify any inmates who were involuntarily housed in restrictive solely for protective purposes for being a high-risk victim or having made an allegation.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Posters and other available information</li> <li>4. Inmate Handbook</li> <li>5. Inmate Orientation</li> <li>6. Site Review</li> <li>7. Email re Safe Alliance and Brave Alliance</li> <li>8. TCSO Website</li> <li>9. Hotline Information</li> </ol>

Interviews with the following:

- PREA Coordinator
- Intake Staff
- Sheriff
- Random Staff
- Random Inmates

Observation of the following:

- Observation of informal interactions between staff and inmates
- Observation of inmates using the telephone system
- Observation of Information Posters inside the housing units, adjacent to telephone and in the booking area

Findings:

The TCSO policy designates multiple mechanisms for the internal reporting of sexual abuse and harassment, retaliation by other inmates or staff for reporting, as well as mechanisms for reporting conditions that may have contributed to the alleged abuse. Policy is written in accordance with the standard.

Policy states:

Reports can be made in various ways, including privately and anonymously upon request, by inmates, staff, or third parties. Reports can include allegations for sexual abuse and sexual harassment of inmates, 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. PREA reports are not required to be submitted, nor shall the reports be referred, to a staff member who is the subject of the complaint. PREA reports may be anonymous. Methods for reporting incidents of sexual abuse or sexual harassment to this Office include, but are not limited to:

- A. Written or verbal correspondence to any staff member, volunteer, or contractor.
- B. Placing a free call to the PREA Hotline from any phone located in areas of inmate housing or Central Booking;
- C. Telephoning, writing, or visiting an organization whose policies allow for the reporting of sexual abuse and sexual harassment and will report these instances for investigation. Examples include Safe Alliance (512)267-7233 and Brave Alliance 512-738-8817;
- D. Telephoning or writing their consular officials and/or officials at the Department of Homeland Security, for inmates held solely for civil immigration purposes.
- E. Filling out a PREA Reporting Form at Visitation and giving it to staff;
- F. Filling out a PREA Report Form through The Travis County Sheriff's Office website; or
- G. Written correspondence through the Inmate Grievance System.

The auditor reviewed the inmate handbook and found that inmates are informed that they may report instances of abuse or harassment by reporting to staff members, both verbally and in writing, as well as by using the inmate telephone system to make a report to the PREA hotline. There are multiple internal ways for offenders to

privately report PREA related incidents, including verbally to any staff member, a written note submitted to staff, through the tablets, anonymous reports within or external to the Sheriff's Office, and third-party reports. This information is received by offenders at intake, contained in the inmate handbook, on the inmate TVs, and on informational posters in all offender housing areas, intake and various other locations throughout the facility. Operational practice at TCSO is consistent with the TCSO policy.

During random staff interviews, staff stated that inmates could make a PREA report to any staff member, write a note, have a friend or family member report for them, or call the hotline. During the site review, the auditor observed reporting information adjacent to all inmate telephones. Random offender interviews revealed that they are aware of the reporting methods available to them.

The TCSO does not typically hold inmates solely for civil immigration purposes.

However, the Sheriff's office has a policy in place requiring inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security. The agency has the consular directory available if needed.

Staff interviews revealed that they are aware of their responsibilities with regard to reporting, and would accept and act on any information received immediately. All staff that were interviewed acknowledged their duty to report any PREA related information. Information on how to report on behalf of an inmate is listed on the agency website. Staff indicated they would accept and act on third-party reports, including from another inmate. Verbal reports are required to be documented.

TCSO policy states that, "2. Any employee, who receives a report of sexual abuse or imminent risk of such, whether verbally or in writing or in any other manner listed above, shall immediately notify the shift supervisor."

TCSO policy provides a requirement that inmates have the option of reporting incidents of sexual abuse to a public or private entity that is not part of the agency. Offenders have the ability to report outside the TCSO, by phone, to Safe Alliance or Brave Alliance. This information is in the inmate handbook, posted by the phones and is given to inmates received at intake. During the site review, the auditor observed PREA informational posters and placards adjacent to the inmate telephones with the Hotline information where reports can be taken and referred immediately for investigation. Most all offenders interviewed were aware of this as a potential reporting method, indicating the offenders are receiving this information.

Documentation provided shows that there have been reports made through the hotline making this a viable reporting method.

The auditor reviewed the allegations for the previous 12 months and found that the allegations were reported through a variety of methods, including reporting directly to both security and non-security staff, hotline, and written communication. This indicates that offenders are aware of the various reporting methods.

The auditor viewed documentation that calls to the Safe Alliance hotline are toll free

calls and are not recorded by the jail's phone system. The Auditor verified the availability of the hotline and their ability to take reports by making a test call. The advocate that answered the phone stated that they could report allegations of PREA from inmates at Travis County. The auditor asked how these allegations would be reported and if there was a specific contact person. The advocate stated that information would be emailed to [tcsoprea@traviscountytexas.gov](mailto:tcsoprea@traviscountytexas.gov). The agency also has an internal hotline that was tested by the auditor. The auditor received notification that the call had been received shortly after making the call.

Policy and the inmate handbook stipulate that 3rd party reports of sexual abuse or harassment will be accepted verbally or in writing. Random inmate and staff interviews revealed that the staff and inmates are aware that third party reports will be accepted and treated just like any other reports, with an investigation started immediately.

A targeted interview with the PREA Coordinator and multiple staff verified that there are multiple ways to make PREA complaints by both staff and inmates, including the use of the inmate phone system, anonymous letters, as well as third party reporting by family and friends. The auditor reviewed investigative files for allegations of sexual misconduct within the last year. There were a variety of reporting methods used.

Policy requires that all staff accept reports of sexual abuse or harassment both verbally and in writing and that those reports shall be documented in writing by staff and responded to immediately. During targeted interviews with staff, the staff indicated that if an inmate reported an allegation of sexual abuse or harassment, they would notify their supervisor of such an allegation and immediately intervene by separating the victim and alleged perpetrator. Each staff member stated that they would take action without delay and would accept a verbal complaint and would be required to make a written report of the incident. During random inmate interviews, the inmates were asked if they knew that they could make a verbal report of an incident of sexual harassment. All the inmates stated that they knew that they could report to any staff member.

Staff may privately report sexual abuse or harassment of inmates either verbally or in writing to their supervisors, PREA staff, investigators, or the Sheriff directly. Staff members are informed of this provision during PREA training. Staff interviews revealed that they are aware they can go directly to facility administration, including the PREA Coordinator or Sheriff to report sexual abuse and harassment of inmates and all staff that were randomly interviewed answered that they would report any such incident to their supervisor. The staff receive this information during annual training, and also have a printed flow chart in the units for easy reference.

The facility has varied and multiple avenues for reporting and a quick turn around for response.

After a review, the Auditor determined that the facility exceeds the requirements of the standard

Corrective Action: None

<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Operating Policy 03-05-06 Inmate Grievance System</li> <li>4. Inmate Handbook</li> <li>5. Staff Interviews</li> <li>6. Inmate Interviews</li> </ol> <p>Findings:</p> <p>Agency policy is written in accordance with the standard. Grievances about sexual assault or sexual harassment will be accepted and reviewed regardless of when the incident took place. Policy allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. The TCSO allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint.</p> <p>TCSO Policy 03-05-06 states:</p> <ol style="list-style-type: none"> <li>I. There will be no time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. TCSO may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.</li> <li>II. Inmates are not required to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.</li> <li>III. An inmate 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 referred to a staff member who is the subject of the complaint.</li> <li>IV. Final decision on the merits of any portion of a grievance alleging sexual abuse will be issued within 90 days of the initial filing of the grievance. <ol style="list-style-type: none"> <li>a. Computation of the 90-day time period shall not include time consumed by inmates in preparing any administrative appeal.</li> <li>b. The agency 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 inmate shall be notified in writing of any such extension and be provided a date by which a decision will be made.</li> <li>c. 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.</li> </ol> </li> <li>V. Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates.</li> </ol>

a. If a third party files such a request on behalf of an inmate, and as a condition of processing the request, the alleged victim inmate must agree to have the request filed on his or her behalf, and must also personally pursue any subsequent steps in the administrative remedy process.

b. If the inmate declines to have the request processed on his or her behalf, the inmate's decision shall be documented.

VI. Anyone who believes that an inmate is subject to a substantial risk of imminent sexual abuse may file an emergency grievance on behalf of the inmate.

a. After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) shall immediately be forwarded to a level of review at which immediate corrective action may be taken. An initial response shall be provided within 48 hours, and a final agency decision within shall be issued within 5 calendar days.

b. The initial response and final agency decision shall document this Office's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

The Sheriff's Office public website provides contact information on how to report sexual abuse and sexual harassment on behalf of the inmate.

The grievance procedures are outlined in the inmate handbook, with a section specific to the grievance procedure for sexual abuse and harassment. Random inmate interviews indicated they are aware of the grievance process and that they can utilize the process to report a PREA allegation. None of the inmates interviewed by the Auditor had filed a grievance alleging an imminent risk of sexual abuse or an allegation of sexual abuse.

Targeted interviews with the PREA Coordinator, grievance coordinator, and agency investigator revealed that all allegations, including ones submitted through the grievance process are immediately referred for investigation. Per the PAQ, the Inmate Grievance System is monitored by the Grievance Sergeant and PREA Coordinator when the grievances are regarding sexual abuse. All grievances alleging sexual abuse or sexual harassment are immediately referred for investigation per PREA.

Per the PAQ, the facility had 53 grievances filed that alleged sexual abuse during the previous 12 months. A sampling of the investigative files confirmed that allegations submitted through a grievance are immediately referred for investigation.

Per the PAQ: The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months: 0

In the past 12 months, the number of inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith: 0

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

**115.53**

**Inmate access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. Inmate Handbook
4. Website information
5. MOU with SAFE Alliance
6. Intake brochure with information on Safe Alliance

Interviews with the following:

- a. PREA Coordinator
- b. Random Inmates
- c. Random and Targeted Staff
- d. Mental Health and Medical Staff
- e. Safe Alliance

Observations of the Following:

- a. PREA informational Posters throughout the facility and public areas

Findings:

The facility provides inmates with access to local, state, or national victim advocacy or rape crisis organizations, including toll-free hotline numbers.

TCSO policy states:

IX. Inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse. Inmates shall be given mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, state, or national victim advocacy or rape crisis organizations. Persons detained solely for civil immigration purposes will be given contact information of immigrant services agencies. Inmates shall be allowed reasonable communication with these organizations in as confidential a manner as possible. Inmates have access to contact information for immigration services agencies through unit postings or requests to staff. Inmates shall be informed, 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.

The PREA brochure, given to inmates upon arrival at the TCJ, states:

If you are or have been the victim of sexual abuse (in the community or in custody) you can receive confidential emotional support services through SAFEline. SAFE is a community organization that provides victim advocacy and support. SAFE is not affiliated with TCSO. Calls and letters to SAFEline are not monitored. Call toll free at 512-267-7233 or write to P.O. Box 19454, Austin, TX 78760.

Staff interviews indicate they are aware of their obligations under this standard.

The auditor reviewed the TCSO PREA brochure and inmate handbook, which included information regarding the availability of outside confidential support services for victims of sexual abuse and harassment. Addresses and phone numbers are provided.

Policy requires that inmates and staff are allowed to report sexual abuse or harassment confidentially and requires that medical and mental health personnel inform inmates of their limits of confidentiality. Targeted interviews with medical and mental health reveal they are aware of their obligations to inform the inmates of the limits of confidentiality. The auditor reviewed documentation that verified this is being relayed to the inmates.

Inmates are informed of the services available during orientation. Most inmates interviewed indicated they knew they could ask to speak to mental health for counseling services if they needed to. They all stated that they had seen the posters all over the facility with the information to report.

The information is listed in the inmate handbook. Staff interviews revealed that outgoing mail is not opened or searched (without documented cause) and there are no restrictions on inmates sending mail to external reporting entities, outside emotional support services, and/or legal mail.

The TCSO has an MOU with SAFEline to establish an agreement for emotional support services. The Auditor was provided a copy of the MOU and verified the agreement for services. The auditor verified the availability of services with SAFEline, as well as facility mental health staff. The auditor viewed documentation that calls to the Safe Alliance hotline are toll free calls and are not recorded by the jail's phone system.

The Auditor verified the availability of the hotline and their ability to take calls by making a test call. The advocate that answered the phone stated that they were able to take calls from inmates at TCJ or TCCC.

Per the MOU, SAFE Alliance agrees (in part) to:

1. Staff a hotline seven days per week, including weekends and holidays, to provide crisis intervention services to inmate victims of sexual abuse in TCSO custody.
2. Review TCSO PREA Policies, procedures and training concerning the prevalence and dynamics of sexual abuse in a confinement setting, and TCSO's response to such.
3. Work with TCSO officials to obtain security clearance for designated Advocates (when and if available) and follow all institutional guidelines for safety and security.
4. Maintain confidentiality as outline by your agency standards.
5. Inform the designated Travis County Jail supervisor of any emergency mental health needs of the inmate that are related to sexual assault or abuse, with proper consent, and without disclosing anything beyond the immediate concern. Information/ concerns from inmates not related to sexual assault/abuse will not be forwarded to TCCC staff.
6. Obtain the inmates' consent and a verbal release of information prior to contacting TCSO or other third parties about any fears or concerns the inmate has related to his/ her safety or well-being. Use professional discretion and follow agency standards and

	<p>applicable laws when reporting concerns to TCSO staff without the inmate's consent.</p> <p>There have been no inmates detained solely for civil or immigration purposes during the audit period. The TCSO has consular information available if needed and is provided upon request.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.54</b>	<b>Third-party reporting</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Third Party Reporting Form</li> <li>4. TCSO Website</li> <li>5. Staff Interviews</li> <li>6. Inmate Interviews</li> </ol> <p>Findings:</p> <p>The TCSO policy is written in accordance with the standards, stipulating that all third-party reports will be accepted and investigated. The TCSO publicly provides a method for the receipt of third-party reports of sexual abuse or harassment through the TCSO website and the third-party reporting form available in visitation. Policy 03-05-09 states: "Reports can be made in various ways, including privately and anonymously upon request, by inmates, staff, or third parties." Policy also states, "All allegations of sexual abuse or sexual harassment, including third party and anonymous reports, shall be reported to the designated investigators. All allegations of sexual abuse and sexual harassment shall be criminally or administratively investigated and a PREA Investigation Report shall be generated. Response to and investigations of PREA incidents will be conducted according to the PREA Coordinated Response Plan for each facility (TCJ or TCCC)."</p> <p>Policy allows that inmates may have a third party report an allegation of sexual misconduct, sexual contact, sexual abuse, and sexual harassment through the Travis County Sheriff's Office's website. The Auditor reviewed the agency website. The website has information on its PREA page that contains information about PREA and their responsibilities for criminal and administrative investigations. It also contains contact and reporting information should any one wish to report an incident of sexual</p>

	<p>abuse or harassment on behalf of an inmate. The auditor completed a test submission of the third-party reporting system through the TCSO website. The auditor received verification of receipt from one of the PREA Compliance Managers the following morning. Conversations with the PREA Coordinator and PREA Compliance Managers confirm that someone monitors the email daily and would immediately respond to any third-party reports. In addition, the auditor viewed the posted information, as well as the third-party reporting forms available in both English and Spanish in the visiting room.</p> <p>Staff interviews reveal that they are aware of their obligation to accept and immediately act on any third-party reports received. Staff, including supervisors, indicate they will accept a third-party report from a family member, friend or another inmate. They would document the report and inform their supervisor and the report would be handled the same as any other allegation or report and investigated thoroughly.</p> <p>Offenders are provided this information at intake through the PREA brochure, as well as the inmate handbook. Offender interviews indicate that they are aware that family or friends or other offenders can call or write and report an incident of sexual abuse on their behalf.</p> <p>The auditor reviewed the investigative files, which confirmed this information.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Review of investigative files</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• Investigative staff</li> <li>• Sheriff</li> <li>• Random Staff</li> <li>• Medical and Mental Health Staff</li> </ul> <p>Findings:</p>

TCSO policy is written in accordance with the standard and requires all staff, contractors and volunteers to immediately report any knowledge, suspicion or information related to sexual abuse or harassment to a supervisor. Policy 03-05-09 states that:

I. Everyone shall report immediately any knowledge, suspicion, or information, regardless of when the incident is alleged to have occurred, regarding:

- A. Incidents of sexual abuse or sexual harassment which occur within a facility, whether or not it is part of this Office.
- B. Retaliation against inmates or staff who reported such an incident.
- C. Any staff in neglect or violation of responsibilities that have contributed to an incident or retaliation.

Policy also states that:

IV. All staff members are required to immediately report any knowledge, suspicion, or information they receive regarding:

A. An incident of sexual abuse or sexual harassment that has occurred, or may be imminent, in a confinement facility, whether or not it is part of this agency;

1. In cases where substantial risk of sexual abuse to an inmate may be imminent, staff are required to immediately take action to protect the inmate (i.e., take some action to assess and implement appropriate protective measures without unreasonable delay).

2. Any employee, who receives a report of sexual abuse or imminent risk of such, whether verbally or in writing or in any other manner listed above, shall immediately notify the shift supervisor.

B. Retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment or have cooperated with an investigation of sexual abuse or sexual harassment; and

C. Any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse, sexual harassment, or retaliation.

In accordance with the standard, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. Policy states:

VI. Allegations of a sexual nature shall be treated with discretion and with as much confidentiality as possible. Information related to an allegation of a sexual nature is shared only with those who need to know to investigate the allegation or to make treatment, security, and/or management decisions.

During the site review, all staff members interviewed were asked if they were required by policy to report any instances or suspicions of sexual abuse or harassment. All the staff members responded unequivocally that they were required to report any such instances. The auditor also informally asked the same question of contracted staff, and they stated that they would report any instance of sexual abuse or harassment immediately to security staff. Interviews with staff indicate they are very clear regarding their duties and responsibilities about reporting PREA related

information, including anonymous and third-party reports. All staff members that the auditor spoke with stated that they were required by policy to report any instance of sexual abuse or harassment or retaliation for making reports, including alleged behavior by staff, contractors or volunteers. All staff members who were randomly interviewed said that they were obligated to report any such allegations or suspicions, no matter who it involved. Staff articulated their understanding that they are required to report any information immediately and document such in a written report.

During the random staff interviews, staff were asked about their requirement for maintaining confidentiality. The staff understand the need to keep the information limited to those that need to know to preserve the integrity of the investigation. Staff indicated that details related to either inmate allegations or staff allegations should remain confidential and they would only discuss details with supervisors and investigators. A targeted interview with the PREA Coordinator and Investigator verified that all investigative files are maintained in a locked area with limited access.

TCSO requires that all medical and mental health personnel disclose the mandatory reporting requirements and limits of confidentiality to victims of sexual abuse.

Interviews with medical and mental health staff indicate they are aware of their mandatory reporting requirements and comply with the mandate to disclose the limits of their confidentiality. Medical and mental health staff are aware of their responsibilities to report information, knowledge, or suspicions of sexual abuse, sexual harassment, retaliation, staff neglect or violations of responsibilities which may have contributed to an incident. The auditor viewed documentation that shows that medical and mental health staff discuss limits of confidentiality with the offenders. Mental health staff stated that inmates are informed about limits of confidentiality and informed consent and acknowledge this at the initiation of any mental health services.

Targeted interviews with the PREA Coordinator, as well as random staff interviews verified that all allegations of sexual abuse or harassment received from a third party are referred for investigation and immediately acted upon.

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency would report the allegation to the designated State or local services agency under applicable mandatory reporting laws. Policy 03-05-09 states, "VII. Unless otherwise precluded by Federal, State, or local law, medical and mental health staff are required to report to the appropriate authorities any suspected or actual child abuse (inmates under 18 years of age), elder abuse (inmates 65 years of age and older) and/or the abuse of a person with a disability. Medical and mental health staff members are required to inform inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. VIII. If the alleged victim is under the age of 18 or considered a vulnerable adult under a state or a local vulnerable persons' statute, this Office shall report the allegation to the designated state or local services agency under applicable mandatory reporting laws. This shall be documented in the PREA Investigation

	<p>Report.”</p> <p>All allegations of sexual abuse and harassment are reported to the on-duty supervisor, who initiates an investigation. The reporting officer and supervisor create a report, and this report is forwarded to the PREA Coordinator for review and further action. In addition, the Sheriff is notified verbally through the chain of command.</p> <p>The Auditor conducted a formal interview with one of the facility investigators, who indicated that all allegations are immediately reported and investigated. The Auditor reviewed the investigative files for all allegations within the previous 12 months and determined that they were promptly reported and investigated as required by the standard.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <p>Evidence Reviewed:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• Sheriff</li> <li>• Random Staff</li> <li>• Random Inmates</li> </ul> <p>Findings:</p> <p>TCSO policy is written in compliance with the standard and requires that whenever there is a report that there is an incident of sexual abuse or harassment, the victim should be immediately protected. Policy states: “1. In cases where substantial risk of sexual abuse to an inmate may be imminent, staff are required to immediately take action to protect the inmate (i.e., take some action to assess and implement appropriate protective measures without unreasonable delay).”</p> <p>Random interviews with staff, both security and non-security, indicate they are clear about their duty to act immediately if an offender is at risk of imminent sexual abuse. Staff indicated they would immediately remove the inmate from the situation, keep</p>

	<p>them separate and safe, and find an alternate place for them to stay or be housed pending an investigation or further action. Staff stated they would ensure the inmate was kept safe, away from the potential threat and an investigation was completed by the supervisor. The PREA Coordinator and Classification staff would be notified in order to determine appropriate housing. Targeted interviews with the Sheriff, Supervisors and the PREA Coordinator confirmed that it is the policy of TCSO to respond without delay when inmates are potentially at risk for sexual abuse or any other types of serious risk.</p> <p>TCSO reports in the PAQ that there have been no determinations made that an offender was at substantial risk of imminent sexual abuse during this review period. The PREA Coordinator confirmed that TCSO did not have any inmates determined by the facility to be subject to a substantial risk of imminent sexual abuse requiring immediate action during the audit period. Per the PAQ, the last time that the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse was in January 2025, and the response was immediate.</p> <p>Any inmate that reports an allegation is immediately separated from the alleged abuser and kept in staff sight at all times until the alleged abuser is secured. If the report is made to staff other than an officer, security staff would be notified immediately. The staff member that the inmate reported the allegation to would remain with the inmate and ensure their safety until security staff responded.</p> <p>The Auditor randomly reviewed files and talked with staff, both formally and informally, and found no evidence that an inmate was determined to be at imminent risk of sexual abuse. There have been no incidents that required action with regard to this standard.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Sample Notifications</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> </ul>

- Major

Findings:

The TCSO's policy is written in accordance with the standard and requires that if the Sheriff or his/her designee receives an allegation regarding an incident of sexual abuse that occurred at another facility, he/she must make notification within 72 hours. Policy 03-05-09 states that, "I. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, staff shall immediately notify the security supervisor of the inmate's housing assignment. The supervisor shall notify the PREA Coordinator and/or PREA Compliance Managers of the inmate's allegation of abuse while confined at another facility. This information is also sent to the Corrections Bureau Major via email.

II. As soon as possible, but not more than 72 hours after this Office receives the allegation, the Corrections Bureau Major shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. The notification shall be documented.

III. Allegations received from other agency offices shall be investigated in accordance with the PREA Standards."

Per the PAQ, In the past 12 months, the number of allegations the facility received that an inmate was abused while confined at another facility: 21

According to targeted interviews with the Major and PREA Coordinator, if they receive such a notice, they would immediately report the allegation to the Sheriff or Administrator of the other facility and document such a notice. They indicated that the email notification serves as the date stamp. The date and time the notification was received by TCSO staff is included in email notification. They confirmed their understanding of their affirmative requirement to report allegations in accordance with the standard. The auditor reviewed examples of notifications regarding reported instances of sexual abuse and found that they were handled in accordance with TCSO policy. The TCSO keeps an Excel spreadsheet regarding notification provided to other facilities. Per the PREA Coordinator, upon notification, PREA staff interview the inmate, gather information, prepare the message for the Major asap, send information to the Major, including due time/date. The Major then emails the other agency administrator directly.

TCSO requires that if the Sheriff or designee receives notice that a previously incarcerated inmate makes an allegation of sexual abuse that occurred at the TCSO, it would be investigated in accordance with the standards. The TCSO reported there have been 3 reports from another facility that an inmate claimed he/she was sexually abused while housed at TCSO within this audit cycle. In the event such allegation is received, the Sheriff or designee shall notify the PREA Coordinator (if the PREA Coordinator is not already aware), who will ensure that an investigation is initiated. Interviews with the Sheriff, Major and PREA Coordinator confirm the staff are aware of their obligation to fully investigate allegations received from other facilities. The auditor reviewed documentation of notices received from other facilities and the resulting investigations.

	<p>Further, interviews with the staff revealed that all staff are aware of their obligations about reporting, and there is a universal understanding and commitment to immediately report any allegations of sexual abuse or harassment, which increases the probability that abuse will be detected, reported, and investigated.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.64</b>	<b>Staff first responder duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. PREA 1st Responder Poster</li> <li>4. Review of investigative files</li> <li>5. Interviews with Random Staff, PREA Coordinator, Investigator</li> </ol> <p>Findings:</p> <p>The TCSO policy is written in accordance with the standard and indicates actions staff should take in the event of learning an inmate has been sexually assaulted. Policy requires that:</p> <ol style="list-style-type: none"> <li>I. For all PREA reports, the following procedure should take place:       <ol style="list-style-type: none"> <li>A. Non-Security staff receiving the report:           <ol style="list-style-type: none"> <li>1. Separate the alleged victim from the alleged abuser; and</li> <li>2. Request the alleged victim and ensure the alleged abuser do not take any actions that could destroy physical evidence including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and</li> <li>3. Immediately notify security staff.</li> </ol> </li> <li>B. Security staff receiving the report:           <ol style="list-style-type: none"> <li>1. Separate the alleged victim from the alleged abuser; and</li> <li>2. Request the alleged victim, and ensure the alleged abuser, do not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and</li> <li>3. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; and</li> <li>4. Immediately notify the on-duty supervisor.</li> </ol> </li> </ol> </li> </ol> <p>Per the PAQ, in the past 12 months, the number of allegations that an inmate was</p>

sexually abused: 116

Per the PAQ, in the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence: 2

Per the PAQ, of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence: 2

Per the PAQ, of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating: 2

Per the PAQ, of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating: 2

The auditor reviewed a sample of the investigative reports for allegations of sexual abuse within the previous 12 months. In all cases, the alleged victim was separated from the alleged perpetrator if the situation warranted. A review of the investigative reports indicated that in all instances, security supervisory staff and/or the PREA Coordinator was notified and an investigation was initiated.

During the on-site portion of the audit, the auditor interviewed 6 inmates who had reported sexual abuse during the previous 12 months. The nature of the allegations made by these inmates did not require evidence collection or preservation. The inmates did state that they were separated from the alleged perpetrator and offered services.

The Auditor conducted interviews with staff first responders. Security first responders were asked to explain the steps they would take following an alleged sexual abuse reported to them. Most all staff interviewed said that they would notify their supervisor after separating the inmates and wait for further instructions. The staff were able to appropriately describe their response procedures and the steps they would take, including separating the alleged perpetrator and victim and securing the scene and any potential evidence. The Auditor was informed the scene would be preserved and remain so until the assigned Investigator arrived to process the scene. A targeted interview with the Investigator and the PREA Coordinator indicated that once the initial steps were done and the scene was secure, a CID detective would be notified, depending on the nature of the investigation.

	<p>The Auditor conducted interviews with supervisory staff. The Auditor asked what the supervisor response and role would be following a report of sexual assault. The supervisors stated that they would ensure the alleged victim and alleged abuser were removed from the area and kept separately in the facility. The crime scene would be secured and a staff member posted to ensure no one entered the scene. The alleged victim would be taken to medical for treatment of any emergent needs and transported to the hospital, if needed. The Sheriff would also be informed.</p> <p>Policy requires that if the first responder is not a security staff member, the staff immediately notify a security staff member. The Auditor conducted formal interviews with non-security personnel. Staff were asked what actions they would take following an alleged sexual abuse reported to them. Staff indicated they would ensure the victim remains with them and immediately inform an officer or supervisor. They would also request the victim not take actions to destroy evidence.</p> <p>Medical personnel interviewed stated they would first ensure a victim's emergency medical needs are met. They stated they would request the victim not to use the restroom, shower, or take any other actions which could destroy evidence. Medical staff informed the auditor they would immediately notify a supervisor if they were the first person to be notified of an alleged sexual abuse. Victims would be transported off-site to the hospital for a forensic exam, if needed. The HSA stated the medical staff would not do anything to destroy evidence.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Flow Chart</li> <li>4. Coordinated Response Plan TCJ and TCCM</li> <li>5. Coordinated Response TCCC</li> <li>6. Interview with PREA Coordinator, Investigator, Medical Staff and Sheriff</li> </ol> <p>Findings:</p> <p>TCSO has a comprehensive coordinated facility plan for both TCJ and TCCC to address actions in response to an incident of sexual abuse among facility staff, including first</p>

responders, supervisory staff, medical, investigative staff and administrators.

Interviews with multiple staff indicate that they understand their duties in responding to allegations of sexual assault and are knowledgeable in their role and the response actions they should take. The TCSO has a flow chart listing actions to be taken by staff in response to a sexual assault allegation to ensure that all aspects of the response are covered and nothing is missed. Many of the facility staff involved in responding to incidents of sexual abuse are also a part of the incident review team.

The Response Plan was provided to and reviewed by the auditor. For both TCCC and TCJ, this is a 48 page document covering definitions, first responder duties, sexual abuse by another inmate - penetration, sexual abuse by staff - penetration, sexual abuse by another inmate - intentional touching, sexual abuse by staff - intentional touching, sexual abuse by staff - attempt, threat or request for sexual penetration/contact, sexual abuse by staff - exposure or voyeurism, PREA incidents from other confinement facilities, sexual harassment by another inmate, sexual harassment by staff. The flow chart is a condensed, quick reference guide of actions to be taken in these situations.

The auditor reviewed investigative files of sexual assault, which indicate staff are appropriately responding to allegations of sexual assault. There were two allegations during the review period that required preservation and/or collection of physical evidence. The auditor reviewed these investigative reports and found that staff appear knowledgeable regarding their duties.

The auditor interviewed the Sheriff, the Corrections Bureau Major, a designated investigator, medical staff, as well as the PREA Coordinator, who all described the facility's coordinated response in the case of an allegation of sexual abuse or harassment. The response begins with the allegation and first responder action to protect the victim, secure the crime scene and protect any potential evidence. The initial investigation begins with the first responders and supervisors, and then the agency investigators. Depending on the nature of the allegation, the investigation will either begin as administrative or criminal. In the case of a criminal investigation, the victim is treated in accordance with policy and provided a forensic exam and ancillary services, as well as offered advocacy services. The remainder of the investigation is dictated by the nature of the allegation. Regardless, all investigations are completed and a finding is assigned. It may be referred for criminal prosecution or handled administratively and could require medical and mental health services and monitoring for retaliation and notice to the victim about the outcome of the investigation.

All staff at TCSO that the auditor spoke with appear to be well-versed in their role and responsibilities in responding to allegations of sexual assault.

The TCSO policy clearly lists the response procedures for all levels of staff including the first responder, the supervisors, Medical and Mental Health, and the Investigators.

Policy requires that the Executive Leadership ensure all aspects of the investigation were conducted in accordance with Sheriff's Office Policies and Procedures.

The Comprehensive Response plan is incredibly thorough,

	<p>After a review, the Auditor determined the facility exceeds the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• Major</li> <li>• PREA Coordinator</li> </ul> <p>Findings:</p> <p>The TCSO has not entered into any agreement that limits the agency’s ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</p> <p>The TCSO prohibits entering into a collective bargaining agreement. Members of the Department are prohibited from affiliating with any labor unions or with any other organization or body, the constitution of which embraces provisions which might in any way exact prior consideration and prevent the proper and efficient functioning of department operations, or that maintains the right of its members to strike; nor shall they become affiliated with, or cause to be established within the Department, any such organization.</p> <p>The auditor determined that there is not a collective bargaining agreement in place.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## Auditor Discussion

Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. Examples of retaliation monitoring

Interviews with the following:

- PREA Coordinator
- PREA Compliance Managers
- Inmates that reported sexual abuse

Findings:

The TCSO's policy is written in accordance with the standard and states retaliation by or against any party, staff or offender, involved in a complaint or report of sexual abuse or sexual harassment shall be strictly prohibited.

Policy 03-05-09 states:

It is the responsibility of the PREA Compliance managers to monitor inmates, and the responsibility of the PREA Coordinator to monitor staff, to protect inmates and staff against retaliation for reporting incidents of sexual abuse or harassment, or cooperating with PREA investigations, pursuant to PREA Standard §115.67.

All inmates and staff who report sexual abuse, sexual harassment, or cooperate with a sexual abuse or sexual harassment investigations shall be protected from retaliation by other inmates or staff.

For at least 90 days following a report of sexual abuse, designated staff shall monitor the conduct and treatment of inmates or staff who have reported sexual abuse and of inmates who were reported to have suffered sexual abuse for possible retaliation by inmates or staff and shall act promptly to remedy any such retaliation. Monitoring should include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Additional monitoring beyond 90 days shall occur if the initial monitoring indicates a continuing need. For inmates, such monitoring shall also include periodic status checks.

Protective measures including: (a) housing changes or transfers of inmate, victims, or abusers, (b) removal of alleged staff or inmate abusers from contact with the victim, and (c) emotional support services shall be employed for inmates or staff that fear retaliation for reporting sexual abuse, sexual harassment, or for cooperating with investigators.

If any other individual who cooperates with an investigation expresses a fear of retaliation, the PREA Coordinator shall take appropriate measures to protect that individual against retaliation.

This Office's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

Retaliation in and of itself, shall be grounds for disciplinary action and will be investigated. Policy requires staff and inmates who report allegations of sexual abuse or harassment are protected from retaliation for making such reports. The PREA Compliance Managers monitor for retaliation of inmates. The PREA Coordinator monitors for retaliation of staff members. Monitoring shall occur beyond ninety (90) days if the initial monitoring indicates a continuing need and monitoring shall cease if the investigation determines that the allegation is unfounded.

The Auditor conducted formal interviews with staff responsible for monitoring retaliation. When monitoring retaliation, they review disciplinary charges and Incident Reports and any other actions related to the inmate, including documents maintained in the inmate's file and his/her electronic record. They stated that anytime anything changes, they will look at those actions. They also indicated they will make referrals to medical and mental health as needed. The monitoring will also include periodic status checks and notations made by the staff monitoring the retaliation. The PREA Coordinator and the PREA Compliance Managers stated that retaliation monitoring begins upon the allegation being received by the PREA office.

The PREA Coordinator stated the monitoring period would be a minimum of 90 days, and longer if necessary. She indicated that staff will meet with them after the conclusion of the investigation and at a minimum of every 30 days.

In the case of an offender being retaliated on by staff, the administration would discuss staff assignments with the supervisor to ensure the staff member is not placed in an area where the inmate is housed.

The PREA Coordinator and Classification staff have the authority to move inmates around the facility or take other protective measures to assure inmates are not retaliated against. Inmates would not be held in Special Management unless requested by the inmate.

In addition, the Sheriff has the authority and would intervene in any way necessary to protect employees from retaliation if they reported incidents of sexual abuse or harassment.

The auditor reviewed examples of monitoring for retaliation provided by the facility and found them to be in compliance with the standard. In addition, staff interviews confirmed their knowledge of the requirements for protection from retaliation for both inmates and staff members.

The facility reported there were no incidents of retaliation in the last 12 months.

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. TCSO Policy 03-04-01 Special Management
4. Review of Investigative Files from the past 12 Months

Interviews with the following:

- PREA Coordinator
- Staff who supervise inmates in Restrictive Housing

Observation of the following:

- Observation of Inmates in restrictive housing

Findings:

The TCSO's policy is written in accordance with the standard and requires the use of segregated housing be subjected to the requirements of PREA standard 115.43.

Policy 03-04-01 states:

- I. Inmates at high risk for sexual victimization and inmates who have suffered sexual abuse 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 such an assessment cannot be conducted immediately, the inmate may be held in involuntary segregated housing for no longer than 24 hours while the assessment is completed.
  - a. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities, is restricted, the following shall be documented in the form of an informational:
    - i. The opportunities that have been limited;
    - ii. The duration of the limitation; and
    - iii. The reasons for such limitations.
  - b. Inmates assigned involuntary segregated housing for these purposes shall only be assigned as such 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.
  - c. If an involuntary segregated housing assignment is made as stated above, the following shall be clearly document:
    - i. The basis of concern for the inmate's safety; and
    - ii. The reason why no alternative means of separation can be arranged.
  - d. Every week, the inmate shall be afforded a review to determine whether there is a continuing need for separation from the general population.

In interviews with staff, they stated they would not place an inmate in segregation for reporting sexual abuse or assault. Staff indicated they would not ordinarily place a

	<p>sexual assault victim in segregation unless he had requested it. Staff explained that other alternatives are explored and segregation is utilized as a last resort. The Auditor was informed of and observed several areas in the facility to place sexual abuse victims to ensure they are protected from abusers without having to place the victim in segregated housing.</p> <p>Per the PAQ, the 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: 1</p> <p>Per the PAQ, the 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: 0</p> <p>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, the 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: 1 (The inmate was in segregated housing pending completion of assessment)</p> <p>The auditor reviewed all the TCSO restrictive housing areas and through informal discussions with supervising staff, no staff indicated that inmates were assigned to restrictive housing because of their sexual vulnerability. Staff indicated that if an inmate that made an allegation were to be held in restrictive housing, it would be very briefly until other housing was arranged or the initial investigation was complete.</p> <p>Interviews with the supervisory staff as well as the PREA Coordinator confirmed their knowledge of their requirements to appropriately adhere to the elements of standard 115.43, after a victim's allegation of abuse.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Federal PREA Standards and Compliance</li> <li>3. Policy 03-05-09</li> </ol>

4. Coordinated Response Plan TCCC and TCJ
5. Review of Investigative files
6. Interviews with Investigative Staff
7. Documentation of Investigator Training
8. Training Curricula for Investigative Training specific to Corrections

Findings:

In accordance with the standard, the TCSO has a policy related to criminal and administrative agency investigations. There are multiple documents that cover this standard.

Policy 03-05-09 states:

- I. The shift supervisor where the victim is housed is responsible for ensuring the incident is appropriately investigated and documented both administratively and/or criminally. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; investigators shall interview alleged victims, suspected perpetrators, and witnesses, and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.
- II. 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. An inmate who alleges sexual abuse shall not be required, by any agency, to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.
- III. There shall be no standard imposed higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated, unsubstantiated, or unfounded.
- IV. When the quality of evidence appears to support criminal prosecution, the supervisor shall notify the Corrections Chain of Command.
- V. Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, digital and documentary evidence and attaches copies of all documentary evidence where feasible. Substantiated allegations of conduct that appear to be criminal shall be referred for prosecution.
- VI. Administratively, each allegation of Sexual Abuse and Sexual Harassment will be documented using the approved PREA documentation system. Documentation for Administrative Investigations shall include:
  - A. Any determinations of whether staff actions or failures to act contributed to the abuse.
  - B. All descriptions of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings; and
  - C. The final disposition of the investigation:
    1. Substantiated: allegation was investigated and determined to have occurred.
    2. Unfounded: allegation that was investigated and determined not to have occurred.
    3. Unsubstantiated: allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether the event occurred.

The Coordinated Response Plan states the following:

For every PREA Incident, the Shift Supervisor where the victim is housed is responsible for completing the PREA Jail Incident Report and the PREA Investigations electronic packet:

1) If the inmate victim elects to file a criminal report, CID will assign a Law Enforcement Detective to the sexual assault case. The Shift Supervisor will gather the initial reports from all involved corrections staff and create a PREA Jail Incident Report. Law Enforcement Detectives will conduct the criminal investigation and make a determination for the case. The detective will notify the Shift Supervisor and the facility PREA Compliance Officer of their findings.

2) If the victim does not elect to file a criminal report, the Shift Supervisor will gather reports from all involved. Note: If the inmate victim elected to have a Non-Reported SAFE, the shift supervisor will not be provided evidence from this exam for their investigation.

3) The PREA Jail Incident Report will remain open while the criminal investigation (if applicable) is underway. Once the completed Law Enforcement report is received, the Shift Supervisor will conduct a prompt, thorough and objective PREA administrative investigation for the incident, documenting the findings in the PREA Investigations electronic packet and the Supervisor Narrative section of the PREA Jail Incident Report. The Shift Supervisor's PREA administrative investigation shall include:

a) Any determinations of whether staff actions, or failures to act, contributed to the abuse;

b) Any direct or circumstantial evidence, including any available video monitoring data;

c) Any interviews of alleged victims, suspected perpetrators, and witnesses;

d) All descriptions of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings;

e) A review of prior complaints and reports of sexual abuse involving the suspected perpetrator;

f) Actions taken to protect the victim (moved, reclassified, referrals, etc.);

g) Actions taken to manage the perpetrator, if applicable (moved, disciplinary action, JMT, etc.); and

h) The final disposition:

1. Substantiated - the allegation was investigated and determined to have occurred.

2. Unsubstantiated - the allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

3. Unfounded - the allegation that was investigated and determined not to have occurred.

i) The Shift Supervisor should utilize the Law Enforcement Reports in their PREA administrative investigation, as necessary.

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) For PREA administrative investigations, there shall be no standard imposed higher than a preponderance of the evidence in determining whether allegations are substantiated, unsubstantiated or unfounded.

r. Substantiated allegations of conduct that appear to be criminal shall be referred for

prosecution, subject to Texas law on victim rights. The facility PREA Compliance Officer shall ensure notification to the PREA Coordinator of the Shift Supervisor/Detective's findings in these cases.

s. The departure of the alleged abuser or victim from the control of this agency shall not provide a basis for terminating an investigation, administrative or criminal.

The PREA Federal Standards and Compliance Manual also cover this standard.

The agency will respond to complaints that are received internally, verbally and in writing and externally by a third party. The policy requires that investigations are responded to promptly. The TCSO investigates all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports. Administrative investigations will include efforts to determine whether staff actions or failure to act contributed to an act of sexual abuse. Investigative reports are required to include a description of physical evidence, testimonial evidence, the reason behind credibility assessments, and investigative facts and findings. 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 an inmate or staff. An inmate who alleges sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

The auditor reviewed investigative reports for allegations of sexual misconduct during the past 12 months. All reports contained the required elements as dictated by the standard. As evidenced by the investigative reports, all allegations are investigated promptly, thoroughly, and objectively. Oversight for all allegations is completed through the PREA Coordinator's office.

If at any time during the investigation, it appears the charges are criminal in nature, the investigation will be referred to the CID. The facility is required to maintain written investigative reports for as long as the alleged abuser is incarcerated or employed by the TCSO, plus an additional 5 years in accordance with records retention schedules. The TCSO prohibits the termination of an investigation if an inmate is released or a staff member is terminated or terminates employment.

When the quality of evidence appears to support criminal prosecution, the investigator shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Per the PAQ, the number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution: 1

At the time of the on-site audit, TCSO employs and provided training records for all staff members who have received specialized training to conduct sexual abuse investigations in confinement facilities. The auditor was provided training curricula and training certificates of designated investigators. The auditor reviewed and verified that each of the facility investigators had proof of receiving the specialized training required by the standard. Each investigator had received specialized training

to conduct sexual abuse investigations in confinement settings. Targeted interviews with a facility investigator verified he had received the training and is available to respond immediately, if necessary.

The Auditor conducted a formal interview with one of the facility's designated PREA Investigators. The Auditor asked the Investigator to describe his process when he is conducting an investigation. He stated he interviews the victim, alleged perpetrator, inmate witnesses, and staff witnesses, if applicable. He stated he reviews the scene, and preserves any evidence, if necessary. In accordance with the standard, he will gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. He reviews any documentation for all inmates involved, including criminal histories, disciplinary history, incident reports, and classification actions. The investigator will review prior reports and complaints of sexual abuse involving the suspected perpetrator. The investigator reviews video footage if applicable, telephone recordings, staff logs, and any other relevant items which could be considered evidence to support the determination. He will keep the PREA Coordinator and facility administration advised of the progress of investigation. If at any point during the investigation he determines there could be potential criminal charges involved, the investigation would be reviewed and discussed for referral and consultation as warranted. The Investigator stated he begins the investigation immediately after receiving an allegation. The PREA Coordinator confirmed the investigative process.

All investigative files are maintained in a locked area with limited access.

Investigative files are maintained for a minimum of five years after the abuser has been released or a staff abuser is no longer employed. An offender who alleges sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition to proceed with the sexual abuse investigation.

If an allegation is reported anonymously, the Investigator stated the investigation would be handled the same as any other investigation. Staff indicate they would continue the investigation even if an inmate is released or a staff member terminates employment during the investigation.

The auditor reviewed investigative reports for allegations of sexual misconduct during the past 12 months. A review of the investigative files indicate that the investigators are conducting the investigations in accordance with the standard. The reports show evidence that the investigator is gathering evidence, interviewing witnesses, victims, perpetrators, and conducting the investigation promptly. Reports indicate that investigators look at each allegation on its own merits and 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. The investigations appear to be conducted promptly, thoroughly and objectively.

During the interview with the designated investigator, the auditor reviewed an investigative file for a closed case that had been referred for criminal prosecution.

The allegation was outside the review period, but served to show the comprehensive of the investigative process and thoroughness of the file. The auditor was incredibly

	<p>impressed with the both the investigator and his explanation of the investigative process, as well as the resulting file and follow-thru.</p> <p>After a review, the Auditor determined the facility exceeds the requirements of the standard.</p> <p>Corrective Action: None</p>
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115.72	Evidentiary standard for administrative investigations
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Review of Investigative files for the past 12 months</li> </ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>• PREA Coordinator</li> <li>• Investigative Staff</li> </ul> <p>Findings:</p> <p>The TCSO imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Policy 03-05-09 states, "III. There shall be no standard imposed higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated, unsubstantiated, or unfounded."</p> <p>A formal interview with one of the designated Investigators confirmed that the staff responsible for administrative adjudication of investigations is aware of the requirements of the evidentiary standard. The investigator was able to articulate what preponderance meant and how he arrives at the basis for his determinations. The PREA Coordinator confirmed that preponderance of the evidence is used in making decisions on the outcome of allegations.</p> <p>The auditor reviewed investigative report for allegations of sexual abuse and sexual harassment within the last 12 months. The auditor reviewed an example of a substantiated allegation, including the basis for the determination. A review of all files indicates that the investigations are being conducted in accordance with the standard.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>

**115.73 Reporting to inmates**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. PREA Federal Standards and Compliance Manual
4. Review of investigative files and notification to inmate

Interviews with the following:

- PREA Coordinator
- Investigator
- Inmates that made allegations of sexual abuse

Findings:

The TCSO policy is written in accordance with the standard and requires an inmate be notified when a sexual abuse allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.

Per the PREA Federal Standards and Compliance Manual:

- A. Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, this Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.
- B. If the agency did not conduct the investigation, this Office shall request the relevant information from the investigative agency in order to inform the inmate.
- C. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, this Office 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) This Office learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
  - (4) This Office learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- D. Following an inmate's allegation that he or she has been sexually abused by another inmate, this Office shall subsequently inform the alleged victim whenever:
  - (1) This Office learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
  - (2) This Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
- E. All such notifications or attempted notifications shall be documented.
- F. This Office's obligation to report under this standard shall terminate if the inmate is

	<p>released from the agency's custody.</p> <p>TCSO Policy 03-05-09 states:</p> <p>VII. All inmates who make an allegation of sexual abuse shall be informed by the investigator of the disposition of the investigation as well as actions taken to protect the victim, pursuant to PREA Standard 115.73. Notifications, or attempted notifications, shall be documented by the investigating supervisor in the PREA Report with a copy forwarded to the PREA section who will save it for future review.</p> <p>The auditor conducted targeted interviews with the PREA Coordinator and Investigator. The agency is responsible for both criminal and administrative investigations.</p> <p>The PREA Coordinator and the Investigator both indicated that inmates are informed of the results of an investigation at the conclusion of the investigation. A form, "Notification of Case Disposition," is used for offender notification, which is signed by both the investigator and the inmate. Documentation of receipt is maintained by the agency.</p> <p>Per the PAQ, the number of criminal and/or administrative investigations of alleged inmate sexual abuse and notifications of the results of the investigation that were completed by the agency/facility in the past 12 months: 81</p> <p>There were 6 inmates who reported sexual abuse at TCCC and TCJ interviewed by the auditor during the on-site portion of the audit. The inmates stated they had received notification of the outcome of their allegations.</p> <p>No outside agencies conduct investigations of sexual assault for the TCSO.</p> <p>The Auditor reviewed the investigative files for reported allegations of sexual assault during the review period. The TCSO made notification to the inmates at the conclusion of the investigation as required. Interviews with a facility investigator and PREA Coordinator confirmed their knowledge of their affirmative requirement to report investigative finding to inmates in custody.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. Interviews with Staff

Findings:

The TCSO PREA and disciplinary policies were reviewed and are in compliance with the requirements of the standard. Staff is subject to disciplinary sanctions up to and including termination for violating the sexual abuse or sexual harassment policies.

Policy 03-05-09 states that: " I. Sanctions for Staff:

- A. Staff shall be subject to disciplinary sanctions up to and including termination for violating TCSO sexual abuse or sexual harassment policies.
- B. Termination shall be the presumptive disciplinary sanction for staff members who have engaged in sexual abuse.
- C. Disciplinary sanctions for violations of policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.
- D. All terminations for violations of sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies."

According to the submitted PAQ, in the past 12 months, there were no staff members who violated agency sexual abuse or sexual harassment policies.

Per the PAQ, in the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse): 0

Interviews with facility staff and administrators verified that staff consider a violation of the PREA policy to be of sufficient seriousness to warrant termination and prosecution in accordance with the law. In staff interviews, the staff were all aware that the agency has a zero-tolerance policy regarding sexual abuse and any such incidents would be investigated and reported to the appropriate agency for prosecution, if necessary.

The Auditor interviewed facility administration regarding the facility's staff disciplinary policy. The Sheriff and Major indicated that if a staff member is terminated for violating the facility's sexual assault and harassment policy, and if the conduct is criminal in nature, it would be referred for possible prosecution. If an employee under investigation resigns before the investigation is complete, or resigns in lieu of termination, that does not terminate the investigation or the possibility of prosecution if the conduct is criminal in nature. The facility would still refer the case for prosecution when a staff member terminates employment that would have otherwise been terminated for committing a criminal act of sexual abuse or sexual harassment.

	<p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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115.77	Corrective action for contractors and volunteers
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Interviews with Staff</li> </ol> <p>Findings:</p> <p>The TCSO PREA and disciplinary policies were reviewed and are in compliance with the requirements of the standard. Staff is subject to disciplinary sanctions up to and including termination for violating the sexual abuse or sexual harassment policies. Policy 03-05-09 states that: " I. Sanctions for Staff:</p> <ol style="list-style-type: none"> <li>A. Staff shall be subject to disciplinary sanctions up to and including termination for violating TCSO sexual abuse or sexual harassment policies.</li> <li>B. Termination shall be the presumptive disciplinary sanction for staff members who have engaged in sexual abuse.</li> <li>C. Disciplinary sanctions for violations of policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</li> <li>D. All terminations for violations of sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies." <p>According to the submitted PAQ, in the past 12 months, there were no staff members who violated agency sexual abuse or sexual harassment policies.</p> <p>Per the PAQ, in the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse): 0</p> <p>Interviews with facility staff and administrators verified that staff consider a violation of the PREA policy to be of sufficient seriousness to warrant termination and prosecution in accordance with the law. In staff interviews, the staff were all aware</p> </li></ol>

	<p>that the agency has a zero-tolerance policy regarding sexual abuse and any such incidents would be investigated and reported to the appropriate agency for prosecution, if necessary.</p> <p>The Auditor interviewed facility administration regarding the facility's staff disciplinary policy. The Sheriff and Major indicated that if a staff member is terminated for violating the facility's sexual assault and harassment policy, and if the conduct is criminal in nature, it would be referred for possible prosecution. If an employee under investigation resigns before the investigation is complete, or resigns in lieu of termination, that does not terminate the investigation or the possibility of prosecution if the conduct is criminal in nature. The facility would still refer the case for prosecution when a staff member terminates employment that would have otherwise been terminated for committing a criminal act of sexual abuse or sexual harassment.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Inmate Handbook</li> <li>4. Review of Investigative Files</li> <li>5. Review of Classification Records</li> <li>6. Interviews with Staff</li> </ol> <p>Findings:</p> <p>The TCSO policy directs that inmates are not permitted to engage in non-coercive sexual contact and may be disciplined for such behavior. Per policy 03-05-09:</p> <p>All inmates found in violation of misconduct of a sexual nature will be placed under disciplinary review. Classification supervisors will be notified of the alleged abuser (inmate) to be placed for JMT review.</p> <p>Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>Sanctions shall be commensurate with the nature and circumstances of the abuse</p>

committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

A requirement for the offending inmate to participate in programs and mental health services designed to correct underlying reasons for abuse shall be considered when determining disciplinary sanctions.

For disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Sexual activity between inmates is prohibited, however such activity does not constitute sexual abuse if it is determined that the activity is not coerced.

TCSO prohibits sexual activity between inmates. Inmates found to have participated in sexual activity are internally disciplined for such activity. If the sexual activity between inmates is found to be consensual and non-coercive, staff will not consider the sexual activity as an act of sexual abuse. Instances of sexual activity between inmates, if reported to be consensual, are still investigated and each case is taken at face value.

TCSO policy states inmates are subject to formal disciplinary action following an administrative finding that they engaged in inmate-on-inmate sexual abuse.

According to the submitted PAQ, there have been three administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility. Any substantiated reports of inmate-on-inmate abuse would result in a disciplinary charge for the perpetrator. There have been no criminal findings of guilt for inmate-on-inmate sexual abuse. The auditor reviewed the investigative files for allegations of sexual misconduct within the last 12 months.

Disciplinary action for inmates is proportional to the abuse committed as well as the history of sanctions for similar offenses by other inmates with similar histories.

Agency policy requires that staff consider whether an inmate's mental health contributed to their behavior before determining their disciplinary sanctions.

There is mental health staff on site to provide mental health services to the inmates at TCSO. Mental health staff provides an array of services, including programming, supportive counseling and crisis intervention. Mental health staff are on call for emergent needs and can transfer inmates if they need more in-depth mental health treatment. Any decision to offer counseling or therapy to offenders and the initiation of any such counseling or therapy for individuals who have committed sexual offenses would be done at the discretion of the mental health staff in conjunction with a treatment plan for the offender. Mental health staff stated that they would provide services to inmate perpetrators, if requested.

	<p>Agency policy stipulates that inmates will not be disciplined for sexual contact with staff unless it is substantiated that the staff did not consent. There were no substantiated instances of inmate on staff sexual assault during the audit period.</p> <p>Agency policy prohibits disciplining inmates who make allegations in good faith with a reasonable belief that prohibited conduct occurred. Interviews with staff and inmates confirm that TCSO is adhering to the provisions of the standard.</p> <p>The Auditor reviewed investigative files, classification files, inmate records and interviewed staff, including a targeted interview with the PREA Coordinator. There is no evidence to suggest an inmate received a disciplinary charge for making an allegation of sexual abuse or sexual harassment in good faith.</p> <p>Interviews with staff and inmates confirmed their knowledge of the policy regarding inmates engaging in non-coerced sexual activity. Furthermore, the staff and inmates were aware that the agency has an internal disciplinary process for inmates who engage in sexually abusive behavior against other inmates and knew that they could be disciplined for sexual abuse. Staff indicated that there is a thorough investigation into all disciplinary reports.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO Policy 04-06-02 Behavioral Health Services</li> <li>4. TCSO PREA Federal Standards and Compliance</li> <li>5. PREA Screening and Follow up mental health referral within 14 days</li> <li>6. Interviews with Staff, including the following: <ol style="list-style-type: none"> <li>a. PREA Coordinator</li> <li>b. MH Staff</li> <li>c. Medical Staff</li> </ol> </li> <li>7. Interviews with Inmates</li> </ol> <p>Findings:</p> <p>The TCSO's policy is consistent with the requirements of the standards. Policy states</p>

that:

Medical and mental health screenings; history of sexual abuse—

B. If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, 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.

C. 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, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

D. 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.

Policy 04-06-02 states, “q. Inmates who are victims of sexual assault are offered the opportunity to participate in a sexual assault support services.”

A random review of inmate files validated that the screenings were being conducted in accordance with the standards and the policy. In addition, there were several documented instances provided by the facility where inmates who were identified as needing follow up care, were offered the follow-up care within the 14-day period prescribed by the standards. An interview with medical staff and mental health staff confirms that if an inmate answers yes on the screening question that they have experienced previous victimization, the inmate is offered a follow-up meeting, which is scheduled at that time. The mental health provider indicated that the 14-day follow-ups entailed a face-to-face meeting with the inmate.

Jail staff ask screening questions, as does the medical staff. This increases the likelihood of inmate reports, and follow-up meetings with a mental health professional.

Interviews with medical and mental health staff also confirmed that referrals are generated if a screening indicates that an inmate has perpetrated sexual abuse, whether it occurred in an institutional setting or in the community. The auditor reviewed risk screenings and documentation of follow-up referrals for inmates identified as perpetrators of sexual abuse.

Of the currently housed inmates at the time of the on-site review, there were inmates identified as having reported previous sexual victimization that were interviewed during the inmate interviews. The inmates recall being offered mental health services, although not all accepted the follow-up meeting.

The Auditor conducted a formal interview with mental health staff. The staff member indicated that inmates identified as needing follow-up care are scheduled to be seen within 14 days. When asked who this information would be shared with, the staff was clear about confidentiality and that this information would be only be shared with

	<p>those who needed to know in order to inform security and management decisions, including treatment plans, housing, bed, work, education, and program assignments. Mental health staff confirm that services are offered to both inmates at risk of victimization, as well as inmates who have a history of sexually assaultive behavior.</p> <p>This information is recorded in the electronic system and each staff member with access has an individual login and password. Interviews with the PREA Coordinator, medical and mental health staff confirmed that information related to sexual victimization and sexual abusiveness is kept secure and confidential with limited staff access. This information is limited access and only used to make housing, bed, work, education, and other program assignments.</p> <p>TCSO policy states that medical and mental health personnel will 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. Interviews with medical and mental health staff confirm that they would gain informed consent before reporting information about prior sexual victimization that did not occur in an institutional setting. The auditor reviewed examples provided by the facility of acknowledgement of informed consent by the inmates.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO PREA Federal Standards and Compliance</li> <li>4. Interviews with Staff, including the following: <ol style="list-style-type: none"> <li>a. PREA Coordinator</li> <li>b. Investigator</li> <li>c. Medical Staff</li> <li>d. Random Security Staff</li> </ol> </li> <li>5. Interviews with Inmates</li> </ol> <p>Findings:</p> <p>The TCSO policy is written in compliance with the standard and states that all inmate victims of sexual abuse will receive timely, unimpeded access to emergency medical</p>

treatment and crisis intervention services. Policy states:

Access to emergency medical and mental health services—

A. 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.

B. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant

to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.

C. Inmate victims of sexual abuse while incarcerated shall be 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.

D. 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.

The Coordinated Response Plan states the following:

a. Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment, the nature and scope of which are determined by medical practitioners according to their professional judgment.

b. HSB Clinic medical staff will ensure the inmate receives stabilization and a wellness check.

c. 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.

d. The inmate victim will remain at the HSB Clinic awaiting a SAFE, if applicable. If the SAFE needs to be postponed for any reason (i.e. a SANE needs to be located; an exam location is undecided) the inmate may return to their unit, as long as they are separated from the perpetrator. The inmate victim should be reminded of what actions destroy evidence.

e. When the SAFE is completed, medical personnel will ensure that the inmate was 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. This is normally covered by the SANE, but in case something was missed or if the victim did not want a SAFE, medical personnel will ensure it is done.

f. TCSO shall offer medical evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in jail.

g. 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.

h. TCSO shall provide such victims with medical and mental health services consistent

with the community level of care.

i. Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

j. If pregnancy results from sexually abusive vaginal penetration while incarcerated in a TCSO facility, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

k. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

Interviews with medical staff confirm that victims of sexual abuse would receive timely, unimpeded access to these services. Medical staff provide coverage 24 hours per day, seven days a week. The staff are aware of their responsibilities with regard to protection of the victim and evidence in the case of a report of sexual assault. In addition, the medical and mental health staff are available 24 hours per day in the case of emergency and/or for crisis intervention services. This was confirmed by the PREA Coordinator, facility staff and medical and mental health staff. For services that are outside the scope of their experience, the victim can be treated at the local emergency department. Forensic exams are conducted off-site at Dell Seton Medical Center by qualified forensic nurse examiners. An advocate from the rape crisis center is available at the request of the victim. The auditor verified the availability of both of these services.

Interviews with facility staff indicate their awareness of the provisions of the standard and their responsibilities if there is a report of sexual abuse.

TCSO policy states that all inmate victims of sexual abuse will be offered information and access to emergency contraception and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care, where medically appropriate. Medical staff was interviewed and confirmed the fact that they knew that they had an affirmative responsibility to provide care without regard to the ability of the victim pay for services or identify the alleged abuser, and the requirement to make a provision for emergency contraception and STD prophylaxis, if required. They confirmed that victims of sexual abuse would be offered these services either at the emergency room or as a follow-up once returned to the facility.

TCSO policy states that forensic examinations will be performed by Sexual Assault Forensic Examiners (SAFE's) or Sexual Assault Nurse Examiners (SANE) at a local hospital without a financial cost to the victim. The inmate would be transferred to Dell Seton Medical Center for this service. Interviews with medical staff confirm that victims of sexual abuse would not be charged for services received as a result of a sexual abuse incident.

The auditor reviewed investigative reports where emergency medical treatment and crisis intervention services were provided to inmates that made allegations of sexual abuse.

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

115.83	<p><b>Ongoing medical and mental health care for sexual abuse victims and abusers</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO PREA Federal Standards and Compliance</li> <li>4. Interviews with Staff, including the following: <ol style="list-style-type: none"> <li>a. Mental Health Staff</li> <li>b. Medical Staff</li> </ol> </li> <li>5. Interviews with Inmates</li> </ol> <p>Findings:</p> <p>The TCSO policy is written in compliance with the standard and states that the facility will offer medical and mental health evaluation and treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p>The TCSO PREA Federal Standards and Compliance states:</p> <p>Ongoing medical and mental health care for sexual abuse victims and abusers—</p> <ol style="list-style-type: none"> <li>A. The facility shall 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.</li> <li>B. 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.</li> <li>C. The facility shall provide such victims with medical and mental health services consistent with the community level of care.</li> <li>D. Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.</li> <li>E. 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.</li> <li>F. Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.</li> <li>G. 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.</li> <li>H. All prisons shall 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.</li> </ol> <p>Inmate victims of sexual abuse while in the facility will be offered tests for sexually</p>
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	<p>transmitted infections as medically appropriate. Interviews with medical staff confirm that inmate victims of sexual abuse would be offered tests for sexually transmitted infections and emergency prophylaxis. Female victims of sexual abusive vaginal penetration while incarcerated would be offered pregnancy tests.</p> <p>The auditor reviewed allegations of sexual assault at the TCSO in the last 12 months where these services have been provided.</p> <p>TCSO policy states that all treatment services for sexual abuse will 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. Interviews with medical staff confirm that these services would be provided to the inmate at no cost.</p> <p>The auditor reviewed documentation provided by the facility of ongoing services and mental health care for inmates identified as victims. In a targeted interview with the mental health staff, she stated that both high risk victims and high-risk abusers would be offered services.</p> <p>Staff interviews confirmed the presence of policies and procedures consistent with the standard and confirmed the medical and mental health staffs' knowledge of the policy and standard. Staff are well-versed in their responsibilities with respect to PREA related incidents. Interviews with inmates confirm they are generally aware of the availability of services should they request or require them. The local rape crisis center, is available for crisis counseling and/or advocacy services and inmates can request to speak with mental health. The auditor verified the availability of these services with the advocacy staff. The auditor reviewed documentation indicating these services are being offered.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.86</b>	<p><b>Sexual abuse incident reviews</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. TCSO PREA Management &amp; Operations: Federal Standards and Compliance</li> <li>4. Incident Reviews</li> <li>5. Interviews with Staff</li> </ol> <p>Findings:</p>
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The TCSO has a policy that governs the review of all substantiated or unsubstantiated allegations of sexual abuse. A review team 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. Such review shall ordinarily occur within 30 days of the conclusion of the investigation.

TCSO policy 03-05-09 states:

XI. The PREA Compliance Manager and upper-level management officials will review all sexual abuse investigations that have concluded within the last 30 days, except those declared unfounded. These reviews shall include input from line supervisors, investigators, and medical or mental health staff. The review shall:

A. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect or respond to sexual abuse.

B. Consider whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status, or gang affiliation, or was motivated or otherwise caused by other group dynamics at the facility.

C. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.

D. Assess the adequacy of staffing levels in that area during different shifts.

E. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

F. Prepare a report of the findings including but not limited to determinations made pursuant to paragraphs (A) through (E) of this section, and any recommendations for improvement and submit such report to the facility head and PREA Compliance Manager.

XII. The facility shall implement the recommendations for improvement or shall document the reasons for not doing so.

TCSO PREA Management & Operations: Federal Standards and Compliance Manual also articulates this information.

Per the PAQ, in the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents: 116

The auditor reviewed examples of the incident reviews provided by the facility. They were completed within 30 days and considered all elements as required by the standard. The incident reviews are completed electronically by all members of the incident review team.

An interview with two members of the incident review team, as well as the Sheriff confirms if there was an incident that required a review, all these factors would be considered. An interview with the PREA Coordinator confirms that a report of the findings, including recommendations for improvement, would be completed and submitted for inclusion in the file. The Sheriff will review the recommendations. The PREA Coordinator also stated any recommendations would be implemented, or the

	<p>reasons for not doing so would be documented.</p> <p>The TCSO has appointed a team that conducts incident reviews at the conclusion of any sexual assault investigations as stipulated by the standard. This was confirmed by targeted interview of the Major and PREA Coordinator. A written report of the findings is prepared and maintained by the PREA Coordinator. She indicated that the reviews ordinarily take place within 30 days of the conclusion of the investigation. She also indicated that the TCSO is actively working on improving the process to ensure the reviews are completed within the required timeframe.</p> <p>Sexual Abuse Incident Reviews are conducted in a standardized form. Team members log in individually to review the various components required by the standard and then this is documented electronically. The review team members can also include comments. Once all team members have reviewed the report, it goes to the Major for final approval. The PREA Coordinator ensures that they are completed in the required timeframe and tracks completion.</p> <p>After a review, the Auditor determined the facility substantially meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.87</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ</li> <li>2. TCSO Policy 03-05-09</li> <li>3. Annual Report 2024</li> <li>4. PREA Investigative Log</li> <li>5. Interviews with Staff</li> <li>6. SSV 2024</li> </ol> <p>Findings:</p> <p>The agency will collect annually accurate, uniform data for every allegation of sexual abuse necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice and complete an annual report based upon said data. In accordance with the standards, all data shall be maintained, reviewed, and collected as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. All such data, upon request, from the previous calendar year shall be provided to the Department of Justice, no later than June 30. The data that is collected and aggregated shall be reviewed in order to assess and improve the effectiveness of its</p>

sexual abuse prevention, detection, and response policies, practices, and training. This includes identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings from its data review and corrective actions for the agency. Such report shall include a comparison of the current year's data and corrective action with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

TCSO policy 03-05-09 states the following:

- I. This Office shall collect accurate, uniform data for every allegation of sexual abuse and sexual harassment at all facilities under its control using a standardized instrument and set of definitions. This data is collected pursuant to §115.87 of the PREA standards, in order to assess and make corrective action plans to improve the effectiveness of this Office's prevention, detection, response policies, practices and training by:
  - A. Identifying problem areas.
  - B. Taking corrective action on an ongoing basis; and
  - C. Preparing an annual report, of its findings and corrective actions for each facility and the agency as a whole. The agency's report shall be approved by the Sheriff and will be made readily available to the public through this Office's website.
- II. All incident-based sexual abuse data shall be aggregated at least annually.
  - A. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.
  - B. All PREA Incident Data, pursuant to PREA Standards §115.87, shall be securely retained.
  - C. The incident-based sexual abuse data collected, pursuant to PREA Standards §115.87, shall be maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

The Auditor reviewed the Annual Report available on the facility website, including aggregated sexual abuse data for calendar years 2022, 2023 and 2024 on the main page. Archived reports are also available going back to 2014. The annual report for 2024 indicates that previously the Travis County Jail (TCJ) and the Travis County Correctional Complex (TCCC) were considered two separate facilities for audit purposes. However, the 2023 audit resulted in one audit report that combined the facilities. To seek clarification, the TCSO presented supporting documentation and requested consideration from the PREA Management Office (PMO) make a determination that TCJ and TCCC count as one facility. The request that TCJ and TCCC be considered as one facility for PREA auditing purposes was granted in November 2024 at which time, the PREA team transitioned to conducting the screenings at TCJ and re-screenings at TCCC. The 2024 Annual Report was signed and dated by the Sheriff on 12-22-2025.

An interview with the PREA Coordinator confirms the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Data from the previous calendar year is supplied to the Department of Justice no later than June 30th, if requested.

	<p>The auditor reviewed the SSV for 2024 submitted by the facility.</p> <p>The facility is collecting and aggregating sexual abuse data on an annual basis as required by the standard. The report uses a standardized set of definitions, which are available on the facility website and in the TCSO policy.</p> <p>The TCSO does not contract with any private facilities for confinement of TCSO inmates.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> <li>1. TCSO Completed PAQ with ADP</li> <li>2. Tracking Spreadsheet</li> <li>3. Annual Report 2022, 2023, 2024</li> <li>4. Website with sexual abuse data</li> <li>5. Interviews with Staff</li> </ol> <p>Findings:</p> <p>As required by the standard, the TCSO ensures that data collected pursuant to 115.87 for all facilities under its direct control will be made readily available to the public through the agency website, excluding all personal identifiers after final approval.</p> <p>TCSO policy 03-05-09 states that:</p> <ol style="list-style-type: none"> <li>I. This Office shall collect accurate, uniform data for every allegation of sexual abuse and sexual harassment at all facilities under its control using a standardized instrument and set of definitions. This data is collected pursuant to §115.87 of the PREA standards, in order to assess and make corrective action plans to improve the effectiveness of this Office’s prevention, detection, response policies, practices and training by: <ol style="list-style-type: none"> <li>A. Identifying problem areas.</li> <li>B. Taking corrective action on an ongoing basis; and</li> <li>C. Preparing an annual report, of its findings and corrective actions for each facility and the agency as a whole. The agency’s report shall be approved by the Sheriff and will be made readily available to the public through this Office’s website.</li> </ol> </li> <li>II. All incident-based sexual abuse data shall be aggregated at least annually. <ol style="list-style-type: none"> <li>A. The incident-based data collected shall include, at a minimum, the data</li> </ol> </li> </ol>

necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

B. All PREA Incident Data, pursuant to PREA Standards §115.87, shall be securely retained.

C. The incident-based sexual abuse data collected, pursuant to PREA Standards §115.87, shall be maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

The Auditor reviewed the Annual Reports available on the agency website, including data for calendar years 2022, 2023 and 2024. The reports indicate that the agency reviewed the data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. The report, entitled “TCSO 2024 PREA Annual Report” includes an overview of the facility’s plan for addressing sexual abuse and aggregated data. The annual report indicates the agency’s efforts to address sexual abuse include continually providing education and staff training, as well as evaluating processes and standardization. Interviews with the PREA Coordinator, Major and Sheriff confirm these efforts.

In accordance with the standard, the annual report includes a comparison of the current year's data and corrective actions with those from prior years. Staff training continues to be a priority for the agency.

An interview with the PREA Coordinator confirms the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. She indicated that the data is used to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training.

The TCSO does not contract with any private facilities for confinement of TCSO inmates.

The report is available at the agency’s website at: <https://www.tcsheriff.org/inmate-jail-info/jail-info/prea>.

There is no information redacted from the report and it is signed by the Sheriff, dated 12-22-2025.

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Evidence Relied upon to make Compliance Determination:

1. TCSO Completed PAQ
2. TCSO Policy 03-05-09
3. Annual Report
4. TCSO Website containing sexual abuse data
5. Interviews with Staff

Findings:

The TCSO, in accordance with the requirements of the standard, mandates that aggregated sexual abuse data from facilities under its direct control be securely maintained. TCSO ensures that data collected pursuant to 115.87 will be made readily available to the public through the agency's website, excluding all personal identifiers after final approval by the Sheriff.

TCSO policy 03-05-09 states:

- B. All PREA Incident Data, pursuant to PREA Standards §115.87, shall be securely retained.
- C. The incident-based sexual abuse data collected, pursuant to PREA Standards §115.87, shall be maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

All sexual abuse data and files are maintained by the PREA Coordinator, with access limited to senior facility management. Aggregated sexual abuse data is gathered from the investigative reports. The Auditor reviewed the agency's website, which included annual reports with aggregated sexual abuse data, as well as an analysis of the data. There were no personal identifiers contained within the report.

The report is available at the agency's website at: <https://www.tcsheriff.org/inmate-jail-info/jail-info/prea>.

There is no information redacted from the report and it is signed by the Sheriff, dated 12-22-2025.

The Auditor was informed sexual abuse and sexual harassment data is maintained for a minimum of 10 years after collection. Per the PAQ and the PREA Coordinator, the information is also maintained in AIM System, the electronic records system used by the agency.

The TCSO does not contract with any private facilities for confinement of TCSO inmates.

After a review, the Auditor determined the facility meets the requirements of the standard.

Corrective Action: None

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Evidence Relied upon to make Compliance Determination:

1. Previous Audit Report
2. PAQ
3. On-Site Review

Interviews with the following:

- PREA Coordinator
- Sheriff
- Random and Targeted Inmates

Observation of the following:

- Observation of, and access to all areas of the TCSO during the site review

The TCSO had its last PREA Audit in April 2023. The Auditor reviewed the agency's previous PREA report dated May 2023. The Auditor was given full access to the facility. The facility administration was open to feedback and all recommendations were implemented immediately. The facility provided the Auditor with a detailed tour of the facility. The Auditor was able to request, review and receive all requested documents, reports, files, video, and other information requested, including electronically stored information. All requested documentation was provided in a timely manner.

All staff at TCSO cooperated with the Auditor and allowed the Auditor to conduct interviews with staff and inmates in a private area. The auditor was permitted to conduct unimpeded private interviews with inmates at both the TCCC and the TCJ, both informally and formally. The Auditor was given private interview rooms to interview inmates, which were convenient to inmate housing areas. The TCSO staff facilitated getting the inmates to the auditor for interviews in a timely and efficient manner. Informal interviews with inmates confirm that they were aware of the audit and the ability to communicate with the auditor.

The auditor was able to observe both inmates and staff in various settings.

Prior to the on-site review, letters were sent to the facility to be posted in all inmate living areas which included the Auditor's address. The Auditor observed notices posted in each inmate living unit that were emailed to the PREA Coordinator prior to the Audit. The Auditor received documentation that the notices to inmates were posted six weeks in advance of the first day of the audit. The auditor received no confidential letters from an parties regarding inmates at either facility.

The facility had an onsite review and audit within the three-year period of the last audit and has completed the onsite review and audit process.

After a review, the Auditor determined the facility meets the requirements of the standard.

	Corrective Action: None
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115.403	Audit contents and findings
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"><li>1. Previous Audit Report</li><li>2. TCSO Website</li></ol> <p>Interviews with the following:</p> <ul style="list-style-type: none"><li>• PREA Coordinator</li></ul> <p>The Auditor reviewed the TCSO website <a href="https://www.tcsheriff.org/inmate-jail-info/jail-info/prea">https://www.tcsheriff.org/inmate-jail-info/jail-info/prea</a>, which contains a link for the May 2023 PREA Audit Report.</p> <p>After a review, the Auditor determined the facility meets the requirements of the standard.</p> <p>Corrective Action: None</p>

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

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

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

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

	facility does not have female inmates.)	
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes

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

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

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<b>115.17 (b) Hiring and promotion decisions</b>		
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
<b>115.17 (c) Hiring and promotion decisions</b>		
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.17 (d) Hiring and promotion decisions</b>		
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
<b>115.17 (e) Hiring and promotion decisions</b>		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.17 (f) Hiring and promotion decisions</b>		
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have	yes

	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?	
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	yes

	agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	
<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes

	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
<b>115.31 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with	yes

	inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	
<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	

	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes

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

	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental	yes

	health care practitioners who work regularly in its facilities.)	
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following	yes

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.41 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

<b>115.41 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
<b>115.41 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Education Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
<b>115.42 (c)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (d)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.42 (g)</b>	<b>Use of screening information</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they	yes

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation	yes

	can be arranged?	
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.51 (b)</b>	<b>Inmate reporting</b>	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision,	yes

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

	(N/A if agency is exempt from this standard.)	
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.53 (a)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.53 (b)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.53 (c)</b>	<b>Inmate access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of	yes

	understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.54 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
<b>115.61 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.61 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.61 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of	yes

	confidentiality, at the initiation of services?	
<b>115.61 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report	yes

	required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate	yes

	with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has	yes

	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?	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d) Reporting to inmates</b>		
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e) Reporting to inmates</b>		
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a) Disciplinary sanctions for staff</b>		
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b) Disciplinary sanctions for staff</b>		
	Is termination the presumptive disciplinary sanction for staff who	yes

	have engaged in sexual abuse?	
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	

	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	

	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph §	yes

	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.)	
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports,	yes

	investigation files, and sexual abuse incident reviews?	
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted	yes

	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?	
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by	na

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