

PREA Facility Audit Report: Final

Name of Facility: Henrico County Regional Jail East

Facility Type: Prison / Jail

Date Interim Report Submitted: 01/04/2021

Date Final Report Submitted: 05/23/2021

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: LaWanda M. Long	Date of Signature: 05/23/2021

AUDITOR INFORMATION	
Auditor name:	Long, LaWanda
Email:	lawandamlong@aol.com
Start Date of On-Site Audit:	11/18/2020
End Date of On-Site Audit:	11/20/2020

FACILITY INFORMATION	
Facility name:	Henrico County Regional Jail East
Facility physical address:	17320 New Kent Highway, Barhamsville, Virginia - 23011
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	Henry C Smith II
Email Address:	smi19@henrico.us
Telephone Number:	8048338689

Warden/Jail Administrator/Sheriff/Director	
Name:	Gerard Collins
Email Address:	col32@henrico.us
Telephone Number:	804-652-1110

Facility PREA Compliance Manager	
Name:	Krystal Spurlock
Email Address:	spu001@henrico.us
Telephone Number:	O: (804) 652-1142

Facility Health Service Administrator On-site	
Name:	Michael Smither
Email Address:	smi43@henrico.us
Telephone Number:	804-501-7196

Facility Characteristics	
Designed facility capacity:	654
Current population of facility:	595
Average daily population for the past 12 months:	513
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	18-72
Facility security levels/inmate custody levels:	min-max
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	102
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	101
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	95

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

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

Agency-Wide PREA Coordinator Information			
Name:	Henry Smith	Email Address:	smi19@henrico.us

AUDIT FINDINGS

Narrative:

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

LaWanda Long, DOJ Certified PREA Auditor, and Rose Durbin, PREA Consultant conducted the PREA Audit for Henrico County Sheriff's Office-Jail East on November 18-20, 2020, a total of fifty-four hours and thirty (30) minutes were spent on-site between the auditor and consultant. The audit began with the notification of the on-site audit that was posted on March 23, 2020, six weeks prior to the date of the on-site review, initially scheduled for May 18-20, 2020. Due to COVID-19, the Jail Administration made the decision to postpone the PREA Audit. The original posted PREA audit notices were removed on April 9, 2020 and confirmation was sent to the auditor via email. On October 5, 2020, confirmation was received from the PREA Coordinator that PREA Audit Notices had been reposted including the new PREA Audit dates of November 18-20, 2020. This auditor received pictures of such posting. The posting of the notices was verified during the tour and via interviews with both staff and inmates. The notices were posted in various locations throughout the facility including the front lobby (public side), housing pods, break rooms, medical, sallyport into the housing areas, intake, and booking. This auditor did not receive any communication from the staff or inmates as a result of the posted notices.

The Pre-Audit Questionnaire, policies, procedures, and supporting documentation for all forty-five (45) standards were uploaded to the Online Auditing System and on October 8, 2020. This auditor was in continuous contact with the PREA Coordinator in reference to the site review and discussed the information the auditor needed upon arrival on the first day of the PREA Audit. Also, additional supporting documents were provided and uploaded during the pre-audit and site review to address deficiencies/questions that this auditor had upon the review of the documentation uploaded. The site review began on the morning of November 18, 2020, with an entrance meeting with the Under Sheriff, Major-Facility Administrator, Security Captain, Programs Captain, PREA Coordinator, and PREA Compliance Managers for Jail East & West. During the entrance briefing, the audit process and a tentative schedule for the three (3) days to include conducting staff and inmate interviews and reviewing the documentation was discussed.

A complete guided tour of the entire facility was conducted including the entrance to the administration building/main building. The areas toured throughout the facility included administration offices, conference room, master control, visitation, staff work areas, intake, kitchen, visitation, medical, classrooms, gymnasium, education offices and classrooms, program area, dining halls, staff dining, laundry, property area, outdoor recreation areas, law library/library, sally port, nine-teen (19) housing units, and transit housing. While touring the laundry area the auditor and consultant observed several blind spots and recommended that mirrors be installed behind the machines to increase visibility. Henrico staff were very receptive to the recommendation and agreed to have the mirrors installed. On January 20, 2020, confirmation was received that the mirrors had been installed.

During the tour, offenders were observed to be under constant supervision of the staff while involved in various activities. The facility was well maintained. Notification of the PREA Audit was posted in all locations throughout the facility as well as postings advising offenders of the Henrico Sheriff's Office

sexual abuse hotline (#55), the National Sexual Abuse Hotline number and the number for the YWCA of Richmond. Also, during the tour, this auditor observed announcements being made when opposite gender staff entered in the housing. Cameras and a video surveillance system enhanced their capabilities to assist in monitoring blind spots and the review of incidents. Henrico Jail East has two hundred and thirty (230) cameras. Additionally, there were no cameras installed in the showering areas. The auditor and consultant were able to view all cameras via the control center. It was confirmed through observation that offenders are not seen on the surveillance system while showering or performing bodily functions. It is the jails practice that all offenders get dress in the shower area prior to exiting. Henrico Jail East does have a camera in their observation cells, however the toilet area on the camera monitors contain a black box prohibiting the viewing of the genitals for individuals monitoring the camera.

On the first day of the site review, there were a total of five hundred and thirty-seven (537) offenders in the facility. Thirty-one (31) inmates were selected by the auditor and consultant from nineteen (19) housing units including restricted housing and medical. The selection was made via the inmate lists provided by the PREA Coordinator on the morning of November 18, 2020, for the interview process. The random inmate selection was done by reviewing the bedlog and selecting inmates/offender of various race and various unit. Nine (9) of the thirty-one (31) offenders selected were identified from the required list of targeted inmate interviews and twenty-two (22) inmates were selected as random interviews. The following interviews for the targeted categories outlined in the auditing guide were conducted: one (1) offender who identified as transgender; three (3) inmates who identified as Lesbian, Gay or Bisexual; two (2) offenders who reported sexual victimization during the risk screening; one (1) offender with cognitive disability; one (1) inmate with a physical disability, and one (1) LEP offender. Interviews for the following targeted categories were not met because the facility did not have inmates in who were designated as youthful inmates, inmates who were blind, deaf or hard of hearing, inmates who reported sexual abuse or inmates in segregated housing for high risk of sexual victimization/who allege to have suffered sexual abuse. On the second day of the site review the offender population was five hundred and twenty-four (524) and on the third and final day of the site review the population was five hundred and twenty (520) offenders.

Inmate interviews indicated they were informed of their right to be free from sexual abuse and sexual harassment and how to report sexual abuse and sexual harassment using several ways of communication such as trusted staff, administrative staff, and the sexual abuse hotline. The YWCA of Richmond and the National Sexual Abuse Hotline information is posted in each housing unit as well. The YWCA agrees to provide free confidential crisis intervention and emotional support services related to sexual abuse or sexual harassment for Henrico County Jail victims. Also, this auditor contacted the representative from the YWCA via telephone after to the site review and confirmed they would provide emotional support services to offenders housed in Henrico Sheriff's Office custody.

During the three-day site review, thirty-four (34) staff were formally interviewed including fourteen (14) random staff from night and day shifts. The staff selection was made via the staff roster provided by the PREA Coordinator on the morning of November 18, 2020, for the interview process. The random staff selection was done by reviewing the rosters for both day and night shift staff and randomly selecting the 5th staff name on the roster, who would not be interviewed during the specialized interviews. Of the thirty-four (34) formal interviews, twenty were specialized interviews which included the following: two (2) medical and mental health staff, one (1) staff supervising restrictive housing, two (2) incident review members, one (1) PREA coordinator, one (1) PREA Compliance Manager, one (1) staff monitoring for retaliation, three (3) intermediate or higher level staff, one (1) human resources staff, one (1) investigator, one (1) staff who perform risk screening, two (2) intake staff, two (2) contractors and agency

head (1) and one (1) Warden/facility director/superintendent or designee were interviewed during the three (3) days of the site review. Overall, the interviews revealed the staff are very knowledgeable of the PREA standards and were able to articulate their responsibilities and their mandated duty to report.

At the end of the third day, an exit briefing with a summary of the findings was conducted with the Under Sheriff, Major-Facility Administrator, Security Captain, PREA Coordinator, PREA Compliance Manager for both Jail East & Jail West, and Administrative Lieutenant. At the exit debriefing, it was discussed additional documentation was required for various standards, with additional concerns regarding 115.41.

The team was informed that the auditor and consultant had to conduct an overall review to include information previously uploaded, information uploaded while on-site and information that had been requested. Henrico Jail East team agreed that all supporting documentation would be uploaded in the Online Auditing System within the next thirty (30) days to ensure that the auditor had time to review in time for the submission of the PREA Audit Report. All requested information was uploaded in the auditing system by the Henrico Sheriff's Office in a timely manner.

AUDIT FINDINGS

Facility Characteristics:

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

It is the mission of Henrico County Sheriff's Office to protect and assist the citizens of Henrico by providing; Security for the jails and county courthouse, rehabilitation for inmates through vocational, mental health, education, and work programs, executing mental health commitment orders and service of civil process documents.

Henrico County Sheriff's Office achieves their mission through professionally trained staff that use state of the art technology. They operate with over 400 staff for the two regional jails, courts, and administrative services office. The Henrico County Sheriff's Office is accredited by; The American Correctional Association (ACA), The Department of Correction (DOC) and The Department of Justice PREA standards.

A "New Generation" Jail, Henrico County Regional Jail East is located on 76 acres in New Kent County and was dedicated on September 17, 1996. It was built as part of a regional agreement between Goochland, Henrico and New Kent counties and is maintained and secured by the Henrico County Sheriff and the Henrico County Sheriff's Office. Jail East is a state of the art "new generation" jail that uses the direct supervision approach and holds the distinction of being the first campus-style jail in the Commonwealth.

Direct supervision offers a barrier free environment between deputies and inmates to encourage communication and more effective supervision. This style helps promote a proactive approach to solving problems. Deputies assigned to Jail Security and Jail Services maintain the safety and order of the facility. Jail Security staff work in the inmate housing areas, move inmates throughout the facility and see to their safety and well-being. They provide security to the community by preventing jail disturbances or escapes. Jail Services staff provide programs and services to the inmate population which include laundry, recreation, visitation, property control, mail delivery and religious services.

Jail East is a progressive facility that features training and rehabilitation by offering a wide range of mental health and substance abuse services as well as educational and vocational training. Classes, programs, and services are provided to assist the inmates to achieve their educational and vocational goals upon their release. These programs are offered through the cooperative effort of staff, community volunteers and outside agencies. The following are examples of the programs offered at Jail East; GED Preparation and Testing; Automotive Repair – completion offers Master Mechanic certification; Cosmetology -1500-hour preparation program for the state boards; Computer Technology; Substance abuse and relapse prevention; Group and individual counseling and Project Hope.

The R.I.S.E. Program is completely voluntary; the inmate must request to be a part of the program and sign a contract to abide by all rules and requirements. Inmates can also request to leave. The program, a seven-day a week, twelve-hour day schedule, focuses on principles that include social learning theory, the twelve-step philosophy, and cognitive-behavioral strategies. This special program is peer-run, under the direct supervision and guidance of Henrico Mental Health. Within the program, participants in Phase II and III are required to lead groups daily. Senior leadership in the program, "Instructors", oversee

participant's adherence to program rules, structure, and format. Security staff is tasked with ensuring there are appropriate behavioral sanctions for any rule violations. The Mental Health staff assists in overseeing the format of the program and facilitates access to all resources/curriculums required by community members for group facilitation. Mental health provides one-time weekly groups to each program pod as well. The seven (7) day a week program includes nine (9) groups per day on the weekdays and a reduced schedule on weekends.

Program Participants can engage in these types of jail program opportunities based on their phase level. During Phase I – Pre-GED and GED testing are available. After completing Phase II – participants may attend classes in Workforce Development and/ or Automotive Repair. After completing Phase III – participants can begin working as a trustee in the jail, apply to participate in the Cosmetology program.

Phase I-The first phase of the R.I.S.E. Program is where the participants explore the negative consequences of their behaviors, develop a commitment to change and learn the basics of recovery. This process includes many psychoeducational opportunities through group classes & meetings, self-guided skill development work, and participation in twelve-step meetings. To move to the next phase, all course work, and a minimum of six weeks in this phase of the program must be completed.

Phase II-While continuing to focus on all the aspects of Phase I, the participant now begins to reinforce their commitment to a clean and sober lifestyle. In Phase II, the participant develops their personal relapse prevention plan and receive program training in becoming group facilitators. To move to the next phase, all course work must be done and a minimum of six weeks in this phase of the program must be completed.

Phase III-In this phase, the participants work on positive life skill development in the areas of independent living, healthy relationships, job readiness, relapse prevention, and release planning. Participants in this phase are responsible for going back and facilitating groups and meetings to those participating in the first phase, working from the philosophy of "each one teach one." From this point, the participant may stay in the program until their release as long as they are actively participating in the program and are in compliance with all the rules and expectations. In some situations, they may move forward in the ORBIT Program.

Jail East also has an Opiate Recovery Based on Intensive Tracking program. The O.R.B.I.T. Program is available to inmates that are addicted to opiate based drugs. This special program begins with a medical detoxification process that begins as soon as they are incarcerated. Once the Court refers the individual to the O.R.B.I.T. Program, the inmate will begin their journey of gradually regaining control over their own lives. The program offers an innovative and intensive approach to rehabilitating opioid addicted inmates. This program is unique as it not only provides substance abuse recovery, but also provides life skills through a slow, step-down approach.

Phase I-The first phase consists of completing the first two phases of the R.I.S.E. (Recovery in a Safe Environment) Program. During this phase, the participant develops their commitment to change their lifestyle. They attend classes and complete self-guided development work that teach the basics of recovery. Furthermore, the participant then will create a personal relapse prevention plan and train to be group facilitators. This is a very intense twelve-hour day, seven days a week program.

Phase II-In this phase, under the supervision of a deputy, the participant is part of a work crew. The work crews do many different types of trades at Henrico County facilities such as grass cutting/landscaping work, painting and washing school buses. When not working, they participant continues training and

meetings to increase their knowledge and skills. This includes support group meetings outside of the facility, where they can have a connection to get the support they need once they are released. A very important part of this phase is the allowance of two, one-hour weekly family contact visits where they are allowed to spend the time with their family in a supervised environment. They are also given the access to go to church weekly, work on their GED, receive vocational training in cosmetology or auto mechanics, or participate in workforce development skills such as interview and resume writing skills.

Phase III-In this phase, the participant is given assistance getting a job. Once employment has been secured, they begin work release. In this phase, they are allowed to leave the facility to go to work and then return to jail. They are monitored by investigators and are subject to random drug testing. As in all previous phases, they continue to attend support meetings and other training to keep their recovery on track.

Phase IV-The fourth and final phase of the O.R.B.I.T. Program is home electronic monitoring; this final stage allows the participant to go to work and be at home, while being monitored by a GPS bracelet. They must continue to attend the support group meetings and subject to random drug testing.

Completion-The program ends at the end of their court sentenced term, equipped with the tools they need to continue in their recovery journey.

The Sheriff's Office, Police Division, Division of Fire, Courts, Commonwealth's Attorney's Office, Defense Bar, County Administration, the Departments of Recreation and Parks, Mental Health and Developmental Services, and General Services, Henrico County Public Schools, and New Kent County Public Schools collaborate and bolster the successful re-entry of inmates into society. Citizens of Henrico County have embraced the inmates participating in this program- offering jobs, resources, and housing.

AUDIT FINDINGS

Summary of Audit Findings:

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

Number of standards exceeded:	0
Number of standards met:	45
Number of standards not met:	0

Number of Standards Exceeded: 0

Number of Standards Met: 45

Number of Standards Not Met: 0 (115.41)

Summary of Corrective Action (if any) This auditor recognizes the hard work that the Henrico Jail East team has exhibited during all phases of the PREA audit to show compliance. Per the auditors request 5 weeks of intake documentation was provided to the auditor on a weekly basis. This auditor reviewed approximately two hundred and seventy-six (276) assessments to include inmate education documentation on a weekly basis over a five-week period and provided weekly feedback to the PREA Coordinator regarding compliance. Based on the follow-up documentation provided, it is the opinion of the auditor that additional samples are required weekly over the next two months to ensure compliance.

Although corrective measures have been put into place, this auditor needs to see 100% compliance on a weekly basis for at least the timeframe outlined. During the corrective action period if 100% compliance is not obtained, the two-month period could be extended up to 180 days in accordance with PREA Resource Center's guidance. Starting Monday, January 4, 2021, the following information will be needed for each inmate received for the next 60 days: Booking Log Sheet & with the corresponding PREA Initial assessments. PREA Initial assessments. The auditor will also request additional samples for reassessments during the corrective action period full compliance of the standard.

During the corrective action period beginning on January 5, 2021. This auditor reviewed weekly documents of assessments completed by staff upon the inmate's arrival in booking. A total of approximately three hundred and one (301) inmate assessments were review and determined to be in compliance with the standard. Additionally, this auditor requested additional reassessment to ensure compliance as well, approximately fifty (50) reassessments were reviewed and determined to be in compliance, concluding the corrective action period on April 21, 2021.

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.11</p> <p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates a zero-tolerance policy toward all forms of sexual abuse and sexual harassment. Per Policy 4D-22-8, the Henrico Sheriff's Office has a zero-tolerance policy for all forms of sexual abuse/assault and sexual harassment and will ensure compliance with legal provisions regarding such activity. This agency strives to provide a safe environment where offenders are free from such assault and sexual misconduct, and makes every effort to detect, prevent, reduce, and punish sexual abuse, assault, harassment, and misconduct. Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p>Henrico Sheriff's Office policy 4D-22-8 also confirms that inmate shall be subject to disciplinary sanctions pursuant to the formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. This policy also, requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is a part of the agency; retaliation against inmates or staff who reported such an incident; an any staff neglect or violation of responsibilities that may have contributed to the incident or retaliation.</p> <p>Policy 4D-22-8 includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment, in addition to providing comprehensive guidelines for implementing the jail's approach towards reducing and preventing sexual abuse, sexual harassment, and sexual misconduct of inmates and how they will respond to sexual abuse and sexual harassment allegations. The Sheriff's Offices shall 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. Additionally, the agency will have a compliance manager for each facility that reports to the PREA coordinator. The PREA coordinator reports to Major Quality Assurance who reports directly to the Undersheriff. Through contract and Memorandums of Understanding, any facilities, or jails that contract for the confinement of Henrico County Sheriff's Office offenders shall include the entity's obligation to adopt and comply with the PREA standards. Any new contract, contract renewal or Memorandums of Understanding shall provide for agency contract monitoring to ensure that the contractor is complying with PREA standards.</p> <p>An interview conducted with the PREA Coordinator while on-site confirmed he works to implement the PREA Standards and indicated he has sufficient time and authority to develop, implement and oversee the agency's efforts toward PREA compliance with the support of the Major, Undersheriff and Sheriff. The PREA Compliance Manager (Sergeant) reports to the Captain (PREA Coordinator) and Administrative Lieutenant.</p>

Affirmation was received during the interviews of random and specialized staff and inmate interviews that the administration has taken the PREA Standards seriously and works towards compliance within the daily operation of the jail. Their commitment to protecting the inmates in their care and custody shows throughout the Henrico County Sheriff's Office team. During the tour of the facility, PREA posters were observed and PREA documentation was visible throughout the facility, creating a PREA complaint culture.

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

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, requires through contract and memorandums of understanding, any facilities, or jails that contract for the confinement of Henrico County Sheriff's Office offenders shall include the entity's obligation to adopt and comply with the PREA standards. Any new contract, contract renewal or Memorandums of Understanding shall provide for agency contract monitoring to ensure that the contractor is complying with PREA standards. Henrico Sheriff's Office entered a Memorandum of Understanding with Riverside Regional Jail Authority on August 19, 2020 to hold juvenile inmates for Henrico Sheriff's Office. Henrico Sheriff's Office also has a contract with Chesterfield Sheriff's Office to house inmates for Henrico Sheriff's Office. Support documentation confirms that this contract was last renewed in August 2017 and the MOU/contract includes the following language, "Will comply with the national standards to prevent, detect, and respond to prison rape under the Prison Rape Elimination Act (PREA), Federal Rule 28 C.F.R. Part 115. Chesterfield County Jail will also comply with policies and procedures that relate to PREA."</p> <p>Based on the review of documentation, the facility has demonstrated compliance with this standard.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates Henrico Sheriff's Office shall ensure that each facility it operates shall develop, document, and make its best effort to comply on a regular basis with a staffing plan that provides adequate levels of staffing, and where applicable, video monitoring, to protect 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. In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan.</p> <p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, requires whenever necessary, but no less frequent than once each year, for each facility the agency operates, in consultation with the PREA Coordinator required by §115.11, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph 1 this section; (2) The facility's development of video monitoring systems and other monitoring technologies and (3) The resources the facility has available to commit to ensure adherence to the staffing plan.</p> <p>A review of Henrico County Sheriff's Office, Policy 2A-12, Protection from Harm, effective date August 2013 requires Supervisory staff conducts a daily unannounced inspection of all areas, including holidays and weekends. Patrols and inspections are documented. Any unusual findings will be forwarded, in writing, to the senior supervisor on duty for review. Shift Lieutenants and Sergeants on duty shall conduct a daily unannounced inspection, including holidays and weekends, of all areas occupied by inmates. Unoccupied housing areas are to be inspected weekly by the Captain of Security. Documentation of staff visits shall be recorded on the Record of Staff Visits form. Documentation of random checks performed by deputies and supervisors shall be recorded on the Housing Unit Activity Log. Documentation of a supervisor's inspection of an unoccupied housing unit shall be recorded by swiping of the proximity card in the housing unit.</p> <p>This auditor reviewed supporting documentation covering the audit period, confirming that supervisors conducted unannounced PREA watch tours in accordance with policy. In addition to the review of documentation interviews conducted while on-site with individuals selected for specialized interviews confirmed that unannounced rounds are conducted daily on all shifts, in all areas of the facility to observe staff and inmate interactions, isolated areas, and deter staff</p>

from sexual abuse and sexual harassment. The PREA Coordinator and PREA Compliance Managers indicated during their interviews that unannounced rounds are conducted daily on all shifts in areas throughout the facility to observe staff and inmate interactions and to deter staff from sexual abuse and sexual harassment.

During the interview with the Major he confirmed that he conducts daily reviews of the Daily Duty Roster for deviations of the Post Audit, as well as making regular rounds and unannounced rounds. The duty post deviations are handled through involuntary overtime, voluntary overtime, or closing of "non-essential" posts. The major confirmed that any changes in staff coverage for the listed duty posts is required to be justified and documented. In addition to deputies conducting physical security checks throughout the facility, there are approximately 230 cameras. Deputies assigned to control rooms monitor the cameras. The layout of the facility allows the control room operators to visually inspect the housing areas through windows and cameras throughout the 22 housing areas.

The interview with the Sheriff (designated as the Agency Head designee) and documentation provided confirms that all projected staffing plans are approved by her and reviewed with Majors, Security Captains, and PREA Coordinator on a yearly basis, addressing all eleven (11) categories as identified per the standard. The Sheriff and Major confirmed during their interviews any deviation from the staff planning must be documented. A review of the projected staffing plan for 2019 were provided to this auditor, signed by the Sheriff on February 3, 2020, which addressed all the requirements of the standard.

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

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, prohibits the confinement of juveniles under the age of 18. Per this policy, Henrico County Jail System is certified by the Virginia Department of Corrections to house adult females, adult males, and juveniles who have been certified as adults. The Sheriff entered an updated Memorandum of Understanding with Riverside Regional Jail Authority on August 19, 2020 to house juveniles under the age of 18, for Henrico Sheriff's Office. This MOU superseded the previous agreement which was implemented by the previous Sheriff dating back to August 2013.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 2C-01, Contraband, effective date August 2016, It is the policy of Henrico County Sheriff's Office that no male staff member will conduct cross gender searches of a female inmate. Cross-gender viewing and search are prohibited except in exigent circumstances or when performed by medical practitioners. All cross-gender strip searches and cross gender visual body cavity searches shall be documented on an incident report that outlines the exigent circumstances. This policy also mandates that all inmates are allowed to shower and perform bodily functions and change clothing without non-medical staff of the opposite gender viewing their breast, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. The facility shall not search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. If the detainee's genital status is unknown, it may be determined during conversations with the detainee, by reviewing medical records, or, if necessary, by learning that the information as part of a broader medical examination conducted in private by a medical practitioner. The agency shall train all sworn staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.</p> <p>Henrico County Sheriff's Office, Policy 2C-01, Contraband, effective date August 2016, General "Pat-Down or Frisk" Search Procedures clearly articulates the way a pat search shall be conducted, outlining all the steps to a take.</p> <p>Random staff and inmate interviews indicated that staff of the opposite gender entering the housing units always announced themselves. During the facility tour, this auditor and consultant observed opposite gender staff making announcements when entering the housing areas. Documentation uploaded to the PREA OAS, supports gender announcements were made when the opposite gender enters the housing area and documented accordingly.</p> <p>A review of the training documentation and staff interviews confirmed staff training on pat down searches, cross-gender pat searches and searches of transgender and intersex offenders are conducted in a respectful and professional manner. During staff interviews, all staff confirmed that cross gender pat search are not allowed, and pat down searches were always performed by same gender staff. Staff were able to articulate what an exigent circumstance would be and were aware that only medical staff could perform body cavity searched. Interviews conducted with random female inmates confirmed that they are always pat searched by female staff and are never prohibited from attending programs because a female staff is not available to pat search them.</p> <p>Random staff and inmate interviews confirmed inmates are able to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing them. The auditor and consultant were able to visually observe the shower and bathroom areas which allowed offenders adequate privacy to shower and perform bodily function without being observed by any staff viewing them. Staff interviews could identify policy on prohibiting staff from searching or physically examining a transgender or intersex offender for determining</p>

inmate's genital status. According to supporting documentation, there have been no cross-gender pat down searches, cross-gender strip or cross-gender visual body cavity searches of inmates conducted at the facility in the past twelve (12) months for the sole purpose of determining an inmate's genital status. In addition, there have been no exigent circumstances of cross-gender pat down, strip or visual body cavity searches of inmates conducted at the facility in the past twelve (12) months.

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

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, ensures The Sheriff's Office shall take appropriate steps to ensure that inmates with disabilities (including, for example, inmate who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p>The Sheriff's office will not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegation. The sheriff's office utilizes an interpretation service that is available 24 hours a day for assistance with any non-English speaking inmates.</p> <p>Random staff interviews indicated the PREA education is provided in a manner to ensure the inmate comprehends the material. Intake staff confirmed that PREA information is provided upon the inmate's arrival. If the inmate advises staff or the intake staff determine that the inmate has a disability appropriate steps are taken to ensure that the inmate can understand the PREA information provided.</p> <p>Intake staff confirmed during their interviews the PREA video is repeatedly played during the intake process which includes closed caption. Henrico Sheriff's Office has a PREA brochure for the purposes of educating inmates, which includes information on the zero-tolerance policy, steps & ways of reporting, prevention strategies, sexual misconduct and sexual harassment definitions, and what to do if sexual assault/sexual harassment or misconduct occurs. This brochure is available in English and Spanish. During the facility tour, this auditor observed the PREA postings throughout the facility in English and Spanish, including the # 55, YWCA Richmond phone number and the National Sexual Abuse hotline number being posted on the bulletin boards located in each housing unit.</p> <p>Henrico County Sheriff's Office uses Language Line Services for interpreter services for inmates who require over the phone or sight translation should the need arise. During staff interviews staff confirmed that inmates are never used as interpreters. Staff confirmed during the random interviews that the language line is available for usage.</p> <p>This auditor conducted a specialized interview with an LEP inmate assigned to the Jail East during the site review via the usage of the language line. The auditor was able to conduct the interview and receive feedback from the offender via the interpreter without any difficulties or concerns.</p> <p>Based on the review of information obtained through staff interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates Henrico Sheriff's 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 (as defined in 42 U.S.C. 1997); b. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or c. Has been civilly or administratively adjudicated to have engaged in the activity described in section (b.) of this section. The Sheriff's Office shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. Before hiring new employees, who may have contact with inmates, the agency shall: Perform a criminal background records check; and 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.</p> <p>Policy 4D-22-8, also confirms the Sheriff's Office shall perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates. The Sheriff's Office will conduct criminal background records checks at least every five years of current employees and annually for contractors that have contact with inmates. The Sheriff's Office will ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (1) of this section in written applications or interviews for hiring or promotions and as a part of the review of current employees. The Sheriff's Office requires that instances of misconduct by employees be reported to Internal Affairs immediately—Material omissions regarding such misconduct, or provisions of materially false information, shall be grounds for termination. Unless prohibited by law, the Sheriff's Office will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p>An interview with the Human Resources Manager confirmed background checks are completed on all current employees annually. These checks consider the pertinent civil or administrative adjudications for all newly hired employees who may have contact with inmates, and anyone considered for promotion. Henrico County Sheriff's Office also conducts the same checks for contractors.</p> <p>The Affirmation of Qualifications Form is completed by the employee prior to an interview for employment and contains the following questions: Have you committed a criminal act which is of a serious nature, reflects moral turpitude, or indicates a tendency to disregard the law (theft, nature, perjury, fraud, etc?) Have you ever been convicted of domestic assault? Have you been convicted, plead guilty or no contest to a felony or offense that would be a felony if committed in the Commonwealth of Virginia? Have you been convicted, plead guilty or</p>

no contest to any misdemeanor sex offense in the Commonwealth of Virginia, another state or the United States, including but not limited to sexual battery under Section 18.2-67.4 of the Code of Virginia or consensual intercourse with a minor 15 or older under clause (iii) of Sections 18.2-371 of the Code of Virginia? Have you been convicted of any crime that requires registration in the Virginia Sex Offender Registry?

Per the Human Resources Manager, an applicant must successfully complete a background investigation before he or she can be selected for an interview.

Additionally, Henrico County Sheriff's Office has an Annual/Promotional Employee Personal Information Update Form, which contains the following statement: PREA HIRING AND PROMOTION PROHIBITIONS: The Henrico County Sheriff's Office must adhere to the United States Department of Justice Final Rule on the "National Standards to Prevent, Detect, and Respond to Prison Rape under the Prison Rape Elimination Act (PREA) Standards" at 28 C.F.R. Part 115 Docket No. OAG-131 RIN 1105-AB34. The Henrico County Sheriff's Office may not hire or promote anyone who may have contact with inmates, residents or offenders under supervision who answer "YES" to any of the following questions: Have you ever engaged in sexual abuse in a prison, jail, lock-up, community confinement facility, juvenile facility, or other institution? Have you ever convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, or coercion, or if the victim did not consent or was unable to consent or refuse? Have you been civilly or administratively adjudicated to have engaged in the activities described? The individual must sign confirming the following: I acknowledge and understand that, should I become subject to these prohibitions in my current position or any subsequent departmental position I may hold involve contact with persons in confinement or under supervision; I will notify Internal Affairs within twenty-four hours of my involvement in any of the above. I understand that this agency has the authority to conduct random criminal history background checks to ensure compliance with these federal standards in relation to the agency's employment practices. Further, I understand that if I am subject to these prohibitions, I may be subject to termination of employment. In addition, if I falsely certify my eligibility for employment and it is subsequently discovered that I have involvement in any of the above, I will be subject to termination or disqualification for employment for the falsification.

The individual designated to conduct the annual background checks certifies that no evidence was found in the VCIN indicating sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other such facility; or 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.

The auditor & consultant reviewed supporting documentation for all background checks conducted on current employees for 2019. However, based on information communicated during the interview with the HR representative the auditor and consultant requested an updated list to include 2020 background checks. As a result, HR staff were able to go back to background check documentation submitted and updated the log with all current employees 2020 background information date. The updated information was uploaded to the PREA OAS during the report writing period to confirm compliance. Background checks were also verified for the staff, contractors, and volunteers' files, who were randomly selected for interviews. These files were complete and showed background checks were conducted as required. This auditor also conducted a review of all volunteers and contractors background checks provided

by Henrico Sheriff Office for compliance.

During the interview with the Human Resource Manager, it was confirmed that staff have a continuing affirmative duty to disclose any such misconduct. An employee's failure to disclose any such previous misconduct would be grounds for termination. The agency will adhere to the standard and upon request will provide information on substantiated allegations of sexual abuse and sexual harassment involving former employees upon request. This review indicated that all current employees completed the Annual/Promotional Employee Personal Information Update Form and provided the completed form to HR.

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

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the Sheriff's Office shall consider the effect of the design, acquisition, expansion, or modification on the agency's ability to protect inmates from sexual abuse.</p> <p>Per policy, when installing and updating a video monitoring system, electronic surveillance system, or other monitoring technology, the Sheriff's Office shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse.</p> <p>Supporting documentation confirms that cameras were added and replaced in the following areas in November of 2018: Building 4 Dayroom-Cell door coverage, Building 5 Dayroom-Cell door coverage, Building 6 Dayroom-Cell door coverage, Building 7 Dayroom-Cell door coverage, and Building 8 Dayroom-Cell door coverage.</p> <p>The auditor and consultant recommend that additional mirrors be added to the laundry to provide additional coverage behind the machines.</p> <p>Based on observations and information obtained through staff interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates to the extent the Sheriff's Office is responsible for investigating allegations of sexual abuse, the Sheriff's Office shall follow uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The Sheriff's Office shall offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The Sheriff's Office shall document its efforts to provide SAFEs or SANEs. The Sheriff's Office has a memorandum of understanding with St. Mary's Hospital for these services. The Sheriff's Office will contact St. Mary's Hospital if the allegation of sexual abuse is outside of 72 hours and within 120 hours of the alleged abuse for direction of the Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) if the victim needs to be transported to St. Mary's for a forensic examination. The Sheriff's Office shall attempt to make available to the victim a victim advocate from a rape crisis center. The Sheriff's Office has an MOU with the YWCA of Richmond for victim advocate services. If a rape crisis center is not available to provide victim advocacy services, the agency shall make an attempt to provide these services from other rape crisis centers. For the purpose of the standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic examination process and investigatory interviews and shall provide emotional support, crisis intervention, information and referrals.</p> <p>There were forty-eight (48) allegations of sexual abuse and sexual harassment received during this audit period. This auditor conducted a review of seventeen (17) investigation files. All administrative and criminal investigations have been completed.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. In addition, per policy the Sheriff can refer allegations of sexual abuse or sexual harassment to an outside agency with the legal authority to conduct criminal investigations, when the allegation involves potentially criminal activity.</p> <p>Policy 4D-22-8, requires all staff members, contractors and volunteers to report any knowledge or suspicions of sexual abuse and sexual harassment, as well as retaliation for reporting such conduct or cooperating with an investigation to their supervisor and/or the PREA Compliance Manager.</p> <p>Interviews with staff confirmed that staff are aware of their obligation to report. Interviews with the Chief, PREA Coordinator, Investigator, and Internal Affairs, confirmed that the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment. Also, any internal investigation that identifies criminal activity or involves a staff member would be immediately referred to Internal Affairs.</p> <p>The Sheriff, Colonel and PREA Coordinator are kept apprised of the investigation by Internal Affairs. The Sheriff's Office website provides the public with a PREA Information Sheet that indicates ways the public can report sexual abuse or sexual harassment of inmates, as well as contact information for the PREA Coordinator and PREA Compliance Manager. There is also a PREA Investigations handout that indicates the Sheriff's Office conducts its own investigations and the PREA requirements concerning evidence collection and administrative and criminal investigations.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates Henrico County Sheriff's Office shall train all employees, volunteers and contractual staff who may have contact with inmates on the following: The Sheriff's Office zero-tolerance for sexual abuse and sexual harassment; How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; Inmates' right to be free from sexual abuse and sexual harassment; The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reaction of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates, and How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. All security staff will be trained in how to properly pat-down searches transgender inmates. All staff will have received In-Service training every two years along with Refresher Training every year. All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards.</p> <p>A review of the staff training documentation including staff training rosters, and staff interviews confirmed all sworn staff receives PREA training during basic academy training and refresher PREA training throughout the year during briefing. All civilian employees receive PREA training during orientation in addition to receiving refresher PREA training throughout the year. All employees have to acknowledge that they understand the training they received. Upon review of the lesson plan for Henrico County Sheriff's Office, it was confirmed the training provided to staff included; zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; Inmates' right to be free from sexual abuse and sexual harassment; The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</p> <p>Staff interviews confirmed staff receive continuous training, their comprehension of the PREA training and their obligation to report any allegation of the sexual abuse and/or sexual harassment. At the facility, it was evident through documentation, interviews, and observation of the day-to-day operations that the staff is trained continually about the PREA standards during shift briefings and the completion of various on-line training.</p>

Roll call training for PREA was conducted in January and February of 2019 as a refresher. PREA training for 2020 for all employees was conducted via webinar due to COVID-19.

During random inmate interviews, they indicated that staff took PREA allegations seriously and they felt safe reporting allegations of sexual abuse and sexual harassment. The PREA Coordinator and all staff confirmed that they are always provided PREA refresher/reminders during staff briefing in addition to having continuous conversations with staff regarding the importance of PREA.

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

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates during orientation, volunteers, contractors, and any other individuals that will have direct offender contact must receive information regarding sexual abuse/assault and the potential consequences for engaging in such behavior with offenders during security training. The level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>A review of the volunteers and contractors training contained information about the department's zero-tolerance policy for sexual abuse and sexual harassment; Volunteer/Contractors responsibilities pertaining to the agency's policies regarding sexual abuse and sexual harassment prevention, detection, and response. Volunteers or Contractors may privately report allegations or incidents of sexual abuse/assault or harassment (staff or offender) at the YWCA (804) 612-6126 or PREA Hotline National 1-800-656-4673; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with offenders; How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders; and How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Volunteers and contractors sign the "PREA Training Acknowledgement Form" upon completion of the PREA training acknowledging that they have received and understand the information above.</p> <p>The facility reports ninety-five (95) volunteers and one hundred and one (101) contractors who may have access to inmates. A review of randomly selected individual contractors and volunteer files contained an acknowledgement that contractors and volunteers completed and understood their requirement for confidentiality and their duty to report any incidents of sexual abuse and/or sexual harassment. Interviews with a contractor and a volunteer confirmed their knowledge of the required PREA training and Henrico County Sheriff's Office zero-tolerance of any form of sexual activity at the facility as well as their duty to report sexual abuse or sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through the volunteer and contractor interviews and documentation, the facility has demonstrated compliance with this standard.</p>

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p data-bbox="248 241 523 277">Auditor Discussion</p> <p data-bbox="248 324 1481 831">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates during the intake process, staff shall inform inmates of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 30 days of intake, the agency shall provide comprehensive education to inmates via video and written materials regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such abuse or harassment. The Sheriff's Office shall take appropriate steps to ensure that inmates with disabilities (including, for example, inmate who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p data-bbox="248 869 1469 1160">Interviews with intake staff confirmed inmates receive appropriate PREA information upon their arrival to the Henrico County Jail East intake area. Inmates are provided with the Sexual Assault Awareness and Prevention Brochure, which is available in both English and Spanish, and the inmate handbook. A review of the above mention material includes the agency zero-tolerance policy, steps & ways of reporting, prevention strategies, sexual misconduct, and sexual harassment definitions, and what to do if sexual assault/sexual harassment or misconduct occurs.</p> <p data-bbox="248 1198 1469 1536">This information is reviewed verbally by staff to ensure inmates can understand. A staff confirmed during random interviews that the language line would be used for limited English-speaking individuals. Posters were observed throughout the facility, to include the intake area that was visible to all inmates ensuring that key PREA information is continuously and readily available. Posters and PREA handouts clearly communicate Henrico County Sheriff's Office zero-tolerance policy, how to report and the right to be free from sexual abuse, and sexual harassment. Information was also posted in the units with information on how to receive emotional support for the YWCA.</p> <p data-bbox="248 1574 1469 1823">Prior to housing placement, the inmate reviews the comprehensive PREA video and assessment is completed on the inmate. The comprehensive PREA Video, PREA: What You Need to Know from the PREA Resource Center informs inmates of their rights to be free from sexual abuse and sexual harassment, the right to be free from retaliation for reporting such incidents, ways to report sexual abuse and sexual harassment, preventing and responding to such incidents.</p> <p data-bbox="248 1861 1481 2154">Additionally, a follow-up is usually conducted by Classification staff within twenty days to address any PREA question the inmate may have. This auditor and consultant reviewed thirty-one (31) inmate files to ensure that comprehensive PREA training was being provided in accordance with the PREA standard. Upon reviewing these files, it was confirmed that comprehensive training is being provided. During the report writing phase staff provided additional samples for offenders received from November 21-December 25, 2020, per the auditors request to confirm this information was being performed consistently. Resulting in a</p>

an additional two hundred and seventy-six (276) inmate education documents being reviewed.

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

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This auditor reviewed training certificate documentation confirming that specialized training for investigators via the National Institute of Corrections (NIC). Henrico County Sheriff's Office has five (5) investigators who have received training in accordance with this standard. An interview with a investigator confirmed completion of the required specialized investigator training as well as the PREA education and refresher training offer through Henrico Sheriff's Office. The investigator indicated the specialized investigation training consisted of interviewing techniques, Miranda warnings, Garrity warnings, sexual abuse evidence collection, and the criteria and evidence to substantiate a case for administrative or prosecution referral. At the facility level, the investigator will conduct an initial inquiry into the alleged allegation of sexual abuse or sexual harassment, subsequently conduct an administrative investigation in consultation with the Office of Professional Standards. The Office of Professional Standards/Internal Affairs, which is a part Henrico County Sheriff's Office, shall conduct further investigation for the determination of criminal charges.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, and review of training documentation, the facility has demonstrated compliance with this standard.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates all full and part-time medical and mental health care practitioners who work regularly in the facility will be trained in: How to detect and assess signs of sexual abuse; How to preserve physical evidence of sexual abuse; How to respond effectively and professionally to victims of sexual abuse and; How and to whom to report allegations or suspicions of sexual abuse; and the agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this policy from the agency or elsewhere.</p> <p>During the site visit, the auditor and consultant were provided with a list of medical and mental health employee. The auditor requested documentation confirm both specialized and refresher training for all medical and mental health employees. Supporting documentation confirming medical training was uploaded to the PREA OAS on December 8, 2020 and mental health supporting documentation was uploaded on December 11, 2020. The review conducted by this auditor contained the training certificates for eleven (11) mental health staff members who completed PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting, and seven-teen (17) medical staff who completed PREA: Medical Health Care for Sexual Assault Victims in a Confinement Setting. This eLearning training was provided by the National Institute of Corrections (NIC). Supporting documentation confirms that both medical and mental health employees participate in in-services and refresher trainings provided by Henrico Sheriff's Office in both 2019 & 2020. The medical staff at the facility do not conduct forensic examinations. Henrico Sheriff's Office has a MOU with St. Mary's Hospital to conduct all forensic exams. Interviews with both a medical and mental health staff member confirmed they had received the appropriate training in detecting and assessing for signs of sexual abuse and sexual harassment; preservation of physical evidence of sexual abuse; responding effectively and professionally to victims of sexual abuse and sexual harassment, and how and to whom to report allegations or suspicious of sexual abuse or sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews, review of documentation, and follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office Policy 4D-22-8, PREA Standards and Procedures, effective date July 2019, with an updated effective date of December 2020, indicates, "All inmates shall be assessed during intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Intake screening shall ordinarily take place within 72 hours of arrival at the facility. Such assessments shall be conducted using an objective screening instrument. The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: a. Whether the inmate has a mental, physical, or developmental disability; The age of the inmate; The physical build of the inmate; d. Whether the inmate has previously been incarcerated; Whether the inmate's criminal history is exclusively nonviolent; Whether the inmate has prior convictions for sex offenses against an adult or child; Whether the inmate is or is not perceived to be gay, lesbian, bisexual, transgender, intersex, or gender conforming; Whether the inmate has previously experienced sexual victimization; The inmate's own perception of vulnerability; and Whether the inmate is detained solely for civil immigration purposes. The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive. Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional relevant information received by the facility since the intake screening. An inmate's risk level shall be reassessed when warranted due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Initial PREA Assessments are to be performed when: a. "PREA Initial Assessment-Long Form" (19 Questions) i. Initial Booking/Intake. ii. Transfer into facility for housing. iii. Return from any other jurisdiction/facility (If More than 24 hours). B. "PREA Initial Assessment-Short Form" (7 Questions) i. transferred into facility for court ONLY and will be returning from any other jurisdiction/facility (If Less Than 24 Hours). PREA Re-Assessments are to be performed: a. Within twenty-eight (28) days of their last Initial PREA Assessment. B. The "PREA Re-Assessment" Form (7 Questions) is to be utilized. Inmates may not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (4) (a), (4)(g), (4)(h), (4)(i), or (4)(j) of this section. The Sheriff's 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."</p> <p>Henrico County Sheriff's Office Policy 2A-25 Inmates to be Classified Prior to Moving to General Population, effective March 2013, indicates, "the Classification Section shall pattern an objective classification system that provides: An organized approach and a management tool to ensure the inmate is housed in an area appropriate to custody level, eligibility and suitability; An ongoing process that attempts to encourage proper adjustment to the jail setting through housing assignment and program participation; An initial custody assessment within three business days of the inmate's commitment, unless prohibited by medical or mental status; Custody level assessment which reflect security needs and determine eligibility and</p>

suitability of the inmate for existing programs by scoring the Initial Custody Assessment form, using the following factors: Inmate's personal information; Court status and pending charges; Current offenses; Institutional behavior (current and prior); Criminal history; Escape history; Prior felony convictions; Alcohol and drug use; Mental health or medical treatment history or needs; Identified stability factors; and History of assaultive behavior committed."

Prior to completing the primary classification, Classification staff will review documentation from all prior incarcerations, specifically noting the inmate's institutional behavior and program involvement. Classification staff, utilizing the Initial Custody Assessment instrument, will gather all pertinent information and then complete the primary classification. Staff interviews confirmed that an initial screening is conducted within seventy-two (72) hours of the inmate's arrival. The screening that is conducted includes questions related to whether or not the offender has or appears to have any disabilities (developmental, physical and mental) whether or not the offender appears to be cognitively impaired, their age, physical build, first incarceration, and prior convictions for sex offenses against an adult and/or child. The screening questions also include questions regarding the inmate's sexual orientation, prior victim of sexual abuse, vulnerability to being sexual assaulted, detained solely for civil immigration, violent offenses, whether the inmate could be perceived as LGBTI or gender nonconforming, and history of institutional violence or sexual abuse/sexual harassment.

Inmates reporting prior victimization, according to staff, are referred immediately for a follow-up with medical or mental health staff. These referrals to medical or mental health staff are documented. Inmates are reassessed no later than 28 days after their arrival and throughout their stay at the facility. The facility's policies limit staff access to this information on a "need to know basis". Access to information is available only to the Administration, facility PCM, QMHP's, medical staff, and Classification and Booking staff.

Any inmate identified as a possible victim of sexual assault or as an abuser will be identified in the Jail Management System as Perceived Abused Inmate or Perceived Abusive Inmate. Staff interviews revealed that inmates identified as high risk for being abused or abusive, or those reporting prior victimization, are referred immediately for a follow-up with the mental health staff. If an inmate answers yes to "Do you want to speak to someone from Mental Health based on the information provided" or "Have you committed prior acts of sexual abuse" a mandatory referral to Mental Health is required.

A review of monthly documentation uploaded to the PREA OAS was reviewed ranging from June 2019 – August 2020, which lead this auditor to seek additional clarification regarding the process. While on-site this auditor and consultant reviewed an additional thirty-one (31) randomly selected inmate files. The auditor and consultant were unable to determine if initial assessments were being completed every time an offender entered Jail East; it was recognized that an assessment was completed at Jail West but not always upon the return to Jail East. Even though Jail West and Jail East are facilities within the same agency, they are two separate facilities with separate staff. When an offender leaves Jail East and goes to Jail West it is reflected in the computer system as a transfer, therefore warranting a new vulnerability assessment to be completed. The auditor and consultant spent additional time during the on-site portion of the audit, in addition to a subsequent conference call, providing clarification regarding the intent of the standard. Henrico Jail East & West has a large number of transfers between facilities which requires an increased number of assessments to be completed. However, there is no way to meet the standard without the vulnerability

assessment being completed.

During intake staff interviews and random offender interviews an additional challenge was revealed regarding the completion of the Initial PREA Assessment. Intake staff were no longer asking the offenders the questions on the assessments, the assessments were being given to the offenders to complete on his or her own during booking/intake. This information was immediately communicated to the PREA Coordinator and the PREA Compliance Managers and corrective measures were implemented immediately while on-site, with a follow-up letter from the Sheriff dated November 23, 2020, outlining the corrective action implemented to correct the deficiencies. In addition to the corrective measures outlined by the Sheriff's memo, Policy 4D-22-8 was updated to include the following language, so all staff were clear on the process and which forms to complete.

PREA Initial Assessments were conducted as part of a larger Initial Custody Assessment within 72 hours of the inmate's arrival at the jail. Reassessments were also conducted within the required thirty (30) daytime frame. Inmate interviews revealed inmates were transferred between Jail East and Jail West regularly, in addition to frequent transfers to other jurisdictions for court. PREA Initial Assessments were not conducted upon arrival back to Jail East. An Abbreviated PREA Assessment was conducted; however, the Abbreviated PREA Assessment did not cover all of the components of the standard. A new process was put into place to ensure all new intakes receive the Initial PREA Assessment. "Initial PREA Assessments are to be performed when: a. "PREA Initial Assessment-Long Form" (19 Questions) i. Initial Booking/Intake. ii. Transfer into facility for housing. iii. Return from any other jurisdiction/facility (If More than 24 hours). B. "PREA Initial Assessment-Short Form" (7 Questions) i. transferred into facility for court ONLY and will be returning from any other jurisdiction/facility (If Less Than 24 Hours). PREA Re-Assessments are to be performed: a. Within twenty-eight (28) days of their last Initial PREA Assessment. B. The "PREA Re-Assessment" Form (7 Questions) is to be utilized." This information was communicated to all Sheriff users, via email from the PREA Coordinator. In addition to the email distribution, Supervisors were directed to conduct roll call training during briefing to review the policy updated and assessment changes. Supporting documentation uploaded to the PREA OAS on December 16, 2020, included Training Rosters with training dates ranging from December 5, 2020-December 11, 2020, confirming staff training.

In addition to the policy updated and corrective measures implemented to obtain compliance. The auditor had a follow-up conversation with the Sheriff regarding concerns with this standard and recommended that the entire population receiving new vulnerability assessments to ensure accurate information was obtained on the assessments and inmates were being housed appropriately. The Sheriff was in total agreement, and in fact, had already determined that the jail population would be reassessed prior to the follow-up conversation based on the information that was communicated by the auditor and consultant while on-site. Supporting documentation was provided to the auditor on December 3, 2020, confirming that new assessments had been completed on all inmates assigned to Henrico Jail East on December 2, 2020. This auditor used the Offender List provided while on-site and randomly selected approximately sixty-two (62) offender assessments to be reviewed. The highlighted list was emailed by the auditor to the PREA Coordinator on December 7, 2020 and the corresponding assessments were uploaded to the PREA OAS on December 8, 2020 and reviewed by the auditor. There were approximately eight (8) out of the sixty-two (62) assessments with discrepancies regarding the completion dates on the newly completed

assessments.

This auditor recognizes the hard work that the Henrico Jail East team has exhibited during all phases of the PREA audit to show compliance. Per the auditors request 5 weeks of intake documentation was provided to the auditor on a weekly basis. This auditor reviewed approximately two hundred and seventy-six (276) assessments to include inmate education documentation on a weekly basis over a five-week period and provided weekly feedback to the PREA Coordinator regarding compliance. Based on the follow-up documentation provided, it is the opinion of the auditor that additional samples are required weekly over the next two months to ensure compliance. Although corrective measures have been put into place, this auditor needs to see 100% compliance on a weekly basis for at least the timeframe outlined. During the corrective action period if 100% compliance is not obtained, the two-month period could be extended up to 180 days in accordance with PREA Resource Center's guidance. Starting Monday, January 4, 2021, the following information will be needed for each inmate received for the next 60 days: Booking Log Sheet & with the corresponding PREA Initial assessments. PREA Initial assessments. The auditor will also request additional samples for reassessments during the corrective action period full compliance of the standard. This information will need to be provided to the auditor or uploaded on the PREA OAS by Tuesday of the following week. During the corrective action period beginning on January 5, 2021. This auditor reviewed weekly documents of assessments, a total of approximately three hundred and one (301) inmate assessments were review and determined to be in compliance. Additional this auditor requested additional reassessment to ensure compliance as well, approximately fifty (50) reassessments were reviewed and determined to be in compliance by this auditor.

The auditor and consultant interviewed offenders that were in the targeted categories for interviews: transgender inmate, gay and bi-sexual. All offenders interviewed communicated that they felt safe and that they were treated with respect.

Staff interviews confirmed should a transgender inmate be received at the jail; consideration would be given to the inmate's own views of their safety in placement and programming assignments.

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

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the agency shall use information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The agency shall make individualized determinations about how to ensure the safety of each inmate. In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. A transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates. The Sheriff's Office shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.</p> <p>The PREA Coordinator and the intake staff interviews described the screening questionnaire. They were able to clearly articulate the screening and assessment process and how that information, along with information derived from medical, records reviews, conversations, and observations, is used to determine an inmate's appropriate placement, housing, and bed assignments, as well as work, education, and program assignments with the goal of keeping all inmates safe and free from sexual abuse. Additionally, it was communicated via staff that both the PREA standards and Henrico County Sheriff's Office prohibits the placement of gay, bi-sexual, transgender, and intersex inmates being placed in a particular housing unit, beds or other assignments based solely on their identification.</p> <p>The Initial Classification Assessment is completed within 72 hours of arrival and the reassessment is conducted within twenty-eight (28) days. 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.</p> <p>Interviews with the PREA Coordinator, PREA Compliance Manager and Classification staff described how information from the Classification Assessment precludes gay, bi-sexual, transgender, and intersex inmates being placed in a particular housing unit, beds or other assignments based solely on their identification or status. In addition, they described the screening and assessment process and how that information, along with information derived from medical and mental health screening and assessments, records reviews, database checks, conversations, and observations, is used to determine an inmate's appropriate placement, housing, and bed assignments, as well as work, and education.</p> <p>Offender interviews also confirmed that inmates who identify as LGBTI are not housed separately or in dedicated wings. The auditor and consultant interviews offenders in the</p>

targeted category of transgender, gay and bi-sexual and they all were housed in the general population in different housing units.

This auditor observed during the tour of the facility that all housing units/pods have single showers, which allows all inmates the privacy to shower separately without other inmates or staff viewing them.

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

115.43	Protective Custody
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1485 1128">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates inmates at high risk of sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document the opportunities that have been limited; the duration of the limitation; and the reasons for such limitations. The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. If an involuntary segregated housing, assignment is made pursuant to paragraph (1) of this section, the facility shall clearly document: the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p data-bbox="252 1173 1485 1330">A memo from the PREA Coordinator dated, September 2, 2020 was uploaded to the PREA OAS on October 29, 2020, confirming during the period of May 2019 thru August 2020, there were no incidents where an inmate, whether protentional victim or aggressor, was involuntarily placed in segregation for longer than thirty (30) days pertaining to a PREA incident.</p> <p data-bbox="252 1375 1485 1576">Specialized staff interviews conducted with staff who works in segregated housing confirmed that offender have not been placed in involuntary segregated housing. However, if an offender was placed in involuntary segregated housing for their own protection, he/she would have access to programs, privileges, education and work only if there is no safety concern. This information would be documented and reviewed.</p> <p data-bbox="252 1621 1485 1688">Interviews with offender who disclosed prior victimization revealed that those inmates were not placed in involuntary segregated housing.</p> <p data-bbox="252 1733 1485 1845">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office shall provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. An inmate who is a victim of sexual assault, sexual abuse, or threatened with sexual activity may request that a particular staff member be made available to receive their information in addition to reporting the assault via the PREA hotline using the inmate telephone system. For anonymity purposes staff may report sexual abuse and sexual harassment of inmates by utilizing the PREA hotline by calling 501-5568. In addition to the PREA hotline, the YWCA of Richmond (804) 612-6126 and the National Sexual Abuse Hotline 1-(800)-656-4673.</p> <p>Henrico County Sheriff's Office has multiple ways that inmates can report sexual abuse and sexual harassment, and retaliation for reporting sexual abuse and sexual harassment. Staff interviews confirmed they accept allegations of sexual abuse or sexual harassment verbally, in writing, anonymously, and from third parties and immediately report, the allegation received to their supervisor and/or the PREA Coordinator. Staff also confirmed during their interviews that they were knowledgeable about their ability to report to the YWCA of Richmond, as well as their supervisor or Internal Affairs privately and anonymously.</p> <p>Policy 4D-22-8 confirms that the PREA hotline (804) 501-5586, monitored by the PREA managers, can also be used as a method to receive third-party reports of sexual abuse/sexual harassment from inmates as well as member of the public. Information on reporting sexual abuse on behalf of an inmate will be made available to the public. Inmates can report to outside resources by calling the YWCA of Richmond (804) 612-6126 or the National Sexual Abuse Hotline 1 (800) 656-4673.</p> <p>Inmates detained solely for civil immigration purposes shall be provided information on how to contact and report incidents of sexual abuse/assault to the Department of Homeland Security Immigration and Customs Enforcement. (visit www.ice.gov/tips or call (866) 347-2423. The Henrico County Sheriff's Office does not detain persons solely for civil immigration.</p> <p>Inmate interviews indicated they were familiar with how to report sexual abuse or sexual harassment. It was also confirmed through the interviews that reporting information was provided during intake, and that this information is posted in the housing areas via PREA posters on how to report in both English and Spanish. While touring the entire facility, it was observed in each pods' dayroom, the PREA information (posters), PREA/Sexual Abuse Hotline number and YWCA of Richmond (804) 612-6126 and the National Sexual Abuse Hotline stenciled on the wall near telephones.</p> <p>A review of investigative files revealed inmates reported sexual abuse and sexual harassment in multiple ways and anonymously.</p>

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

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 6B-01, Inmate Grievance Procedures, effective date March 2018, mandates the PREA Coordinator will ensure the following: The inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. The Sexual Abuse Incident Review Team shall submit for review by the Sheriff or his designee a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Computation of the 90-day time period shall not include time consumed by inmates in preparing any administrative appeal. The Sexual Abuse Incident Review Team may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The PREA Manager shall notify the inmate in writing of any such extension and provide a date by which a decision will be made. Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing request for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of the inmates. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision. In cases where there is a substantial risk of imminent sexual abuse, an inmate may file an emergency grievance after which the inmate will be relocated immediately.</p> <p>Per policy, after receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance and any portion thereof that alleges the substantial risk of imminent sexual abuse) to the PREA Manager who will forward the report for immediate corrective actions. The initial response shall be provided within 48 hours, and the final decision within 5 calendar days. The initial response and the final agency decision shall document the agency's determination whether the inmate is at substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.</p> <p>Per policy, the agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.</p> <p>Interviews with staff confirmed the inmates receive an explanation on how to use the grievance process to report allegations of abuse and has administrative procedures/appeal process for dealing with inmate grievances regarding sexual abuse or sexual harassment during intake and they are provided with an Inmate Handbook which provides this information as well. Inmates may place written grievance forms in the designated mailboxes located at the entrance of all housing units that are checked daily. Inmate interviews confirmed there is a grievance process relating to sexual abuse or sexual harassment complaints at the facility. Four (4) sample was reviewed of grievance filed alleging sexual harassment along with the completed investigation. There were no emergency grievances submitted during this audit cycle alleging sexual abuse or sexual harassment per the PREA Coordinator.</p> <p>Based on the review of the agency policy and procedures, observations and information</p>

obtained through staff and offender interviews and review of documentation, the facility has demonstrated compliance with this standard.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office will attempt to make available a victim advocate from a rape crisis center, qualified community-based organization staff member or a qualified agency staff member. This advocate shall accompany and support the victim through the forensic medical examination process, investigatory interviews and shall provide emotional support, crisis intervention, information and referrals. The Sheriff's Office has a memorandum of understanding (MOU) with the YWCA of Richmond for victim advocate services.</p> <p>Henrico County Sheriff's Office provides access to outside victim advocates for emotional support services related to sexual abuse to all inmates by providing both the mailing addresses and telephone numbers for the YWCA of Richmond. During the site review and upon review of supporting documentation, it was determined that the mailing address was not provide to the inmates in accordance with the standard. However, during the writing of this report, supporting documentation was provided to this auditor showing postings that were placed in each housing unit to include the services provided by YWCA, contact information to include phone number, address, fax number and email address.</p> <p>Additionally, during the site review there was information was located in the lobby for the general public as to how they can report sexual abuse and sexual harassment in the jail to the PREA Coordinator and Jail Administration. Contact information is provided in addition to the YWCA and the National Sexual Abuse Hotline toll free number.</p> <p>Per staff interviews, mail to the YWCA would be is considered privileged correspondence.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.54	Third-party reporting
	<p data-bbox="252 170 895 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1477 618">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the PREA hotline (804) 501-5586, be monitored by the PREA managers, can also be used as a method to receive third-party reports of sexual abuse/sexual harassment from inmates as well as members of the public. Information on reporting sexual abuse on behalf of an inmate will be made available to the public. Inmates can report to outside resources by calling the YWCA of Richmond (804) 612-6126 or the National Sexual Abuse Hotline 1 (800) 656-4673.</p> <p data-bbox="252 663 1477 954">The Henrico County Sheriff's Office website gives the general public information on how to report sexual abuse or sexual harassment. This information provides the names of the PREA Coordinator and both PREA Compliance Managers with their contact information to include phone number and email addresses. This information is provided in both English and Spanish. In addition to the agency PREA contact information being listed on the website, information is also listed on how to report incidents of sexual abuse/harassment to the following entities: YWCA Richmond (804) 612-6126 National Sexual Abuse Hotline 1 (800) 656-4637.</p> <p data-bbox="252 999 1477 1155">During the on-site review, information was located in the lobby for the general public as to how they can report sexual abuse and sexual harassment in the jail to the PREA Coordinator by providing the phone number and email address. This information is also, located on Henrico Sheriff's Office website.</p> <p data-bbox="252 1200 1477 1447">Staff and investigator interviews confirmed they receive allegations of sexual abuse or sexual harassment from third party reporters and that these are reported to investigators immediately and investigated. Staff interviews confirmed third party reporting through fellow inmates, family members, attorneys, and outside advocates. Inmate interviews confirmed their awareness of reporting sexual abuse or sexual harassment to others outside of the facility and the ability to have a third-party report on their behalf if the need arose.</p> <p data-bbox="252 1491 1477 1603">Based on the review of the agency policy and procedures, observations and information obtained through staff and Inmate interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.61	Staff and agency reporting duties
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 280">Auditor Discussion</p> <p data-bbox="252 327 1469 1128">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is a part of the agency; retaliation against inmates or staff who reported such an incident; an any staff neglect or violation of responsibilities that may have contributed to the incident or retaliation. Apart from reporting to designated supervisors or investigators, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Unless otherwise precluded by Federal, State or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (1) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services. If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statue, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws. The Sheriff's Office shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.</p> <p data-bbox="252 1171 1465 1715">Random staff interviews as well as interviews with the Sheriff, PREA Coordinator and PREA Compliance Manager confirmed the requirement to report any knowledge, suspicion or information of sexual abuse or sexual harassment immediately. Staff confirmed they would notify their supervisor then complete a written report with the details of the PREA allegation whether it was sexual abuse, sexual harassment, or retaliation for reporting a PREA allegation. Also, staff confirmed that they are prohibited from sharing information with anyone who is not part of the investigation or reporting process. Interviews with medical staff confirmed their responsibility to inform inmates of their duty to report and limitations of confidentiality. The Sheriff, Major and PREA Coordinator indicated that all alleged sexual abuse or sexual harassment reports, regardless of where the information came from, are reported immediately to the PREA Compliance Managers. A review of seventeen (17) allegations of sexual abuse and sexual harassment revealed that the investigation began immediately upon receipt of the information.</p> <p data-bbox="252 1758 1469 1877">Henrico County Sheriff's Office does not confine juveniles, nor has there been any incidents involving vulnerable adults. Administrative staff are responsible for notifying outside agencies when the alleged victim is under the age of 18 or an aged or incapacitated offender.</p> <p data-bbox="252 1919 1394 2036">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, the facility has demonstrated compliance with this standard.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, requires when the Sheriff's Office learns that an inmate is subject to substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p>Documentation and interviews with the Sheriff, Major and other randomly selected staff were able to articulate, the steps they would take, upon becoming aware that an inmate may be subject to a substantial risk of imminent sexual abuse. Staff interviews indicated if an inmate were in danger of sexual abuse or at substantial risk of imminent sexual abuse, they would act immediately to ensure the safety of the inmate, separate from the alleged perpetrator, and contact their immediate supervisor. The PREA Coordinator interview and the pre-audit questionnaire confirmed there had been no incidents that involved an immediate action to protect an inmate that was a substantial risk of imminent sexual abuse in the past twelve (12) months at the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation the facility has demonstrated compliance with this standard.</p>

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Jail Administrator or PREA Coordinator that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. Notification shall be documented on a memorandum to the PREA Coordinator.</p> <p>The PREA Coordinator interview, the pre-audit questionnaire and memo to the auditor confirmed there were no reports made by Henrico County Sheriff's Office, to another agency head that an offender had been sexually abuse/sexual harassed while confined at another facility during this audit period. Additionally, there were no reports received by Henrico Sheriff's Office from another confinement facility alleging that an offender was sexually abused or sexual harassed while in the custody of Henrico Sheriff's Office custody. Interviews with the Sheriff, Major and PREA Coordinator confirm their knowledge of both the policy and the standard regarding their responsibilities to report any allegations received regarding another agency and to investigate allegations received from other agencies alleging sexual abuse or sexual harassment that occurred at Henrico County Sheriff's Office. The PREA Coordinator confirmed the agency would document make all notifications made in accordance with the standard.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: Separate the alleged victim and abuser. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>Interviews with the staff and a first responder validated their knowledge and understanding of actions to be taken upon learning that an inmate was sexually abused and provided the action steps identified in the policy of their responsibilities as a first responder and aware of why they do these duties. A review of the training files confirmed that all staff receive information on how to respond to an allegation of sexual abuse in accordance with the Henrico County Sheriff's Office policy stated above. There has been no staff responding as a first responder to an incident of sexual abuse during the past twelve (12) months. Additionally, Henrico County Sheriff's Office completes a sexual assault checklist on all allegations of sexual abuse.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation the facility has demonstrated compliance with this standard.</p>

115.65	Coordinated response
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1468 528">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, requires the Sheriff's office will take the following coordinated actions in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="252 573 1461 819">Interviews with the Sheriff and staff confirmed confirmed they are knowledgeable of their duties to coordinate actions taken in response to an incident of sexual abuse. This auditor reviewed the PREA Coordinated Response Plan for incidents of sexual abuse. The plan consisted of systematic guidance for SART members which includes the Major of Quality Assurance, PREA Coordinator, PREA Compliance Manager, Medical, Mental Health, Investigators/Internal Affairs, SANE of SAFE of St. Mary's Hospital, and staff first responders.</p> <p data-bbox="252 864 1455 976">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>In accordance with the Code of Virginia, collective bargaining is prohibited. Per 40.1-57.2, “no state, county, municipal, or like governmental officer, agent or governing body is vested with or possesses any authority to recognize any labor union or other employee association as a bargaining agency of any public officers or employees, or to collectively bargain or enter into any collective bargaining contract with any such union or association or its agents with respect to any matter relating to them or their employment or service.”</p> <p>Based on the information discovered in the Code of Virginia and interview with the PREA Coordinator, the auditor has determined the facility meets the requirements of the standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office shall protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The PREA coordinator will be in charge of monitoring retaliation for at least 90 days following a report of sexual abuse through follow-up interviews. The PREA Coordinator shall oversee the PREA Managers and Classification Officer(s) monitoring victims of sexual assault or harassment and protect them from any forms of retaliation. The PREA Coordinator will continue to ensure that the PREA Managers and Classification Officer(s) follow-up for at least 90 days or until there is no longer a threat. Periodic status checks will also be conducted with the victim. For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy any such retaliation. Items the agency should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.</p> <p>An interview with PREA Compliance Manager confirmed she is responsible with overseeing the monitoring of the conduct or treatment of inmates or staff who reported sexual abuse of inmates and staff who report retaliation for cooperating with an investigation regarding sexual abuse/sexual harassment. She articulated that she would document thirty (30), sixty (60) and ninety (90) day checks of victims, reporters, and others who express fear of retaliation on the Henrico County Correctional Management System-PREA Sexual Abuse Retaliation Monitoring Section. Additionally, the PREA Compliance Manager confirmed that she would review disciplinary, housing changes, work assignments, and facility disciplinary charges, negative performance reports as well as reassignments of staff during the monitoring process, in addition to speaking with the individual being monitored face to face. The Pre-Audit Questionnaire indicated there have been no inmate protective measures for retaliation during the past twelve (12) months. A review of seventeen (17) investigation files confirm that staff are monitoring for retaliation in accordance with the standard.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates for post-allegation protective custody, any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of §115.43. Please refer to Sheriff's Office policy 2A-46— Special Management Inmates.</p> <p>Per Henrico County Sheriff's Office, Policy 2A-46, Protection from Harm, effective date August 2013, requires an inmate shall be assigned to protective custody status when there is documentation that protective custody is warranted, and no reasonable alternatives are available. Each protective custody case shall be reviewed by Classification with the goal of terminating the separate housing assignment as soon as possible. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours will completing the assessment. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education or work opportunities, the facility shall document: The opportunities that have been limited; b. The duration of the limitations; and c. The reasons for such limitations. The facility shall assign such inmates to involuntary segregation housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. Involuntary segregated housing assignment is made pursuant to paragraph (2) of this section, the facility shall clearly document the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. 6. Every 30 days, the facility shall afford each such inmate a review to determine whether there is continuing need for separation from the general population. An inmate who requests or who has refused protective custody shall be required to sign a Protective Custody Notice, BC-051.</p> <p>Per the interview with the PREA Coordinator there have been no inmates identified as high risk of victimization requiring placement in restricted housing during this audit period. The Sheriff interview indicated that an offender may be placed in involuntary restrictive housing overnight in order to determine an alternative means of separation from potential abusers and/or other housing area. An interview with staff who work in restrictive housing confirmed they had not witnessed any offenders being placed in involuntary restrictive housing. The deputy indicated if offenders were placed in involuntary segregation for their own protection, they would have access to programs, privileges, education and work only if there are no safety concerns. The staff also confirmed during the interview that this information would be documented and reviewed in accordance with policy at least every thirty (30) days by the designated administrators. There were no offenders to interview who were at risk of sexual victimization who were placed in placed in involuntary segregation housing. This was also confirmed via the review of investigation files. A memo dated September 2, 2020, from the</p>

PREA Coordinator to the Sheriff, confirming Henrico County Jail East did not involuntarily segregate any offenders due to them being at high risk for sexual victimization.

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

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates when the Sheriff's Office conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly and objectively for all allegations, including third-party and anonymous reports. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator. When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with the County Attorney's Office as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. 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.</p> <p>Administrative Investigations: Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. Criminal investigations shall be documented in a written report that contains a thorough description of physical testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution. The agency shall retain all written reports in reference to sexual abuse and/or harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. The departure of the alleged abuser or victim from the employment or control of the agency shall not provide a basis for terminating the investigation.</p> <p>Documentation review, interviews with an investigator and PREA Coordinator from Henrico County Sheriff's Office confirmed all five (5) investigators have completed the required specialized investigator training as well as the PREA education. The investigator indicated an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, regardless of how the information is initially obtained. The Sheriff, Investigator(s) and PREA Coordinator confirmed that investigations begin immediately upon notification. The facility investigator, who conducts an initial inquiry into the alleged allegation of sexual abuse or sexual harassment, to determine if criminal behavior is involved, at which time the investigation would be referred to the Henrico Sheriff's Office Internal Affairs investigator has the legal authority to conduct criminal investigations. The investigator interview confirmed the credibility of the victim is based on evidence found, and that no polygraph examination or truth-telling device is a condition for proceeding with an investigation. In addition, the investigator confirmed an investigation would not cease until complete, regardless if the alleged perpetrator is released or terminates employment, or if the victim leaves the facility prior to the completion of the investigation.</p> <p>A review of the investigation files of alleged staff's or offenders sexual abuse or sexual harassment that occurred within Henrico County Sheriff's Office in the past twelve (12) months</p>

contained the required information in accordance policy, procedures and the PREA Standard.

There were two substantiated allegations that appeared to be criminal and referred for prosecution in the past twelve (12) months.

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

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>An interview with the investigator confirmed they investigate the allegation and indicate no standard higher than a preponderance of the evidence will be imposed in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates following an investigation into an inmate's allegations that he or she suffered sexual abuse in the facility, the Sheriff's Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This information will be conveyed by the completion of form MED-099G Allegation of Sexual Abuse—Report to inmate.</p> <p>Policy 4D-22-8 also requires Henrico County Sheriff's Office to notify the inmate following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the inmate's unit; (2) The staff member is no longer employed at the facility; (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. (5) Following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever: (6) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (7) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. (8) All such notifications or attempted notifications shall be documented. (9) An agency's obligation to report under this standard shall terminate if the inmate is released from the agency's custody.</p> <p>Interviews with both the investigator and the PREA Coordinator confirmed all investigation outcomes, whether the allegation is determined to be substantiated, unsubstantiated or unfounded following an investigation are communicated in writing to the alleged victim. The PREA Coordinator also confirmed he is responsible for this notification and the documentation is maintained with the investigation information. Monthly documentation was reviewed ranging from May 2019-August 2020, confirming that offenders are consistently notified of the outcome of the completed investigation. This documentation included both the staff making the notification and the offender's signature along with the date of the notification notated by both individuals.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, confirms staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Interviews with the Chief, Human Resource Manager and documentation review confirmed there have been no employees who were terminated during this audit period for violations of the facility's sexual abuse or sexual harassment policies. All disciplinary sanctions/resignations are maintained in the employee's HR file.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.77	Corrective action for contractors and volunteers
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 1476 526">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, requires any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p data-bbox="252 571 1436 638">The PREA Coordinator confirmed there have been two allegations reported alleging sexual abuse against a contractor, which resulted in immediate termination.</p> <p data-bbox="252 683 1468 840">Interviews with two (2) contractors confirmed they were aware of Henrico County Sheriff's Office's zero tolerance against sexual abuse and sexual harassment, how to report sexual abuse and sexual harassment and the consequences for engaging in sexual abuse or sexual harassment of inmates.</p> <p data-bbox="252 884 1460 996">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates that inmates shall be subject to disciplinary sanctions pursuant to the formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate on-inmate sexual abuse. 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. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced. Mental health counseling is available for both victims and perpetrators of sexual abuse. For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>Documentation review revealed that there have been no administrative findings of guilt for inmate-on- inmate sexual abuse that have occurred at the facility in the past twelve (12) months that resulted in disciplinary action. A review of the investigation reports did not find any substantiated outcomes of sexual abuse or sexual harassment that resulted in disciplinary action taken towards the alleged perpetrator or an alleged victim when it was determined that the allegation was fabricated.</p> <p>An interview with the Sheriff indicated that offenders may also be referred for prosecution if the allegations were criminal.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.81	Medical and mental health screenings; history of sexual abuse
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1484 1128">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates if the screening pursuant to §115.41 indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. If the screening pursuant to §115.41 indicates that an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. If the screening pursuant to §115.41 indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, work, education, and program assignments, or as otherwise required by Federal, State or local law. 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.</p> <p data-bbox="252 1173 1452 1249">Interviews with both the Sheriff and the PREA Coordinator confirmed that inmates under the age of eighteen (18) are not housed at this facility.</p> <p data-bbox="252 1294 1476 1581">Interviews with the medical and mental health staff confirmed that although there were no disclosures while conducting risk assessments, all offenders were offered follow-up meetings with medical providers and mental health staff. Also, medical staff confirmed the referral process for inmates who report sexual victimization or are identified as being sexually abusive at intake is reported within fourteen (14) days. Medical staff identified the requirement for informed consent before reporting information about a sexual victimization that did not occur in an institutional setting.</p> <p data-bbox="252 1626 1468 1778">Documentation review confirmed medical staff conducts intake screening during the initial intake process including informed consent disclosures. There were no inmates who disclosed prior victimization and aggression during their initial screening process within the past twelve (12) months.</p> <p data-bbox="252 1823 1460 1939">Based on the review of the agency policy and procedures, observations and information obtained through staff interviews and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Medical staff will be informed when there is a complaint of a sexual assault and will complete the Medical Services Sexual Assault Response Checklist Form PSMED 099C that includes the "Informed Consent for Sexual Assault Forensic Examination Form". Medical staff will arrange for the victim to be transported under appropriate security provisions to St. Mary's Hospital for treatment and gathering of evidence by a forensic nurse. Members of the Sheriff's Office or the medical staff will not perform treatment or gather evidence from an inmate who may be a victim of a sexual crime. The Sheriff's Office will attempt to make available a victim advocate from a rape crisis center, qualified community-based organization staff member or a qualified agency staff member. This advocate shall accompany and support the victim through the forensic medical examination process, investigatory interviews and shall provide emotional support, crisis intervention, information and referrals. The Sheriff's Office has a memorandum of understanding (MOU) with the YWCA of Richmond for victim advocate services.</p> <p>Additionally, per Henrico County Sheriff's Office policy, the facility shall provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The facility shall inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. While receiving treatment for the assault, the victim will be tested for sexually transmitted diseases. Medical staff will request a medical report from the treating hospital of the provided treatment and such documentation may be used in the gathering of evidence for criminal prosecution. Other information to be requested, but not limited to, will be: The medical history taken by health care professionals who conducted an examination to document the extent of physical injury; a copy of the inmate's consent form for an examination and the collection of physical evidence in an approved manner; a copy of the test results for the presence of sexually transmitted diseases. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Upon return to the jail facility from the hospital: Medical staff shall provide the victim prophylactic treatment and follow-up for sexually transmitted diseases to the victim, as appropriate. The Watch Commander will place the inmate on special watch until evaluated by mental health staff. Mental Health staff shall provide a mental health evaluation to assess the need for crisis intervention counseling and long-term follow-up.</p>

Interviews with the medical and mental health staff confirmed that offender victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The medical and mental health staff indicated that services begin immediately upon notification of a victim of sexual abuse from the shift supervisor. The shift supervisor will ensure that the offender is immediately escorted to medical for an evaluation and/or transport to St. Mary's Hospital for forensic examination. Also, the medical staff's interview indicated the medical provider would prepare a consultation and refer the inmate to St. Mary's Hospital for assessment of the patient and determination whether a forensic evaluation and rape kit is required and to begin any sexually transmitted infection prophylaxis treatment/services and orders for follow-up services. Upon completion of the offender's physical examination by the local hospital and upon return to the jail, a mental health evaluation will be performed to determine the potential for suicidal ideation and/or the need for more in-depth psychiatric intervention or treatment. At this time, the mental health staff will determine whether the offender may require crisis intervention counseling, and will ensure that it is provided, if it is deemed necessary.

During the past 12 months, there had been no allegations where a victim required a forensic medical examination at the facility.

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

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. If pregnancy results from the conduct, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.</p> <p>Per Policy 4D-22-8, upon return to the jail facility from the hospital, Medical staff shall provide the victim prophylactic treatment and follow-up for sexually transmitted diseases to the victim, as appropriate. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Interviews with the medical and mental health staff confirmed that victims are offered a sexual assault assessment, individual counseling, medication as ordered by the physician, testing for STD and HIV and follow-up. Mental Health staff would conduct a mental health evaluation to assess the need for crisis intervention counseling and long-term follow-up. The facility also provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including tollfree hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations.</p> <p>There have been no allegations of alleged inmates sexual abuse that occurred in this facility in the past twelve (12) months. The medical and mental health staff have a protocol in place to assist inmates upon discharge from the facility to continue services if needed.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, review of documentation, and the follow-up documentation, the facility has demonstrated compliance with this standard.</p>

115.86	Sexual abuse incident reviews
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1485 1256">A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the Sheriff's Office shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review will occur within 30 days of the conclusion of the investigation during the weekly Sexual Abuse Response Team (SART) meeting. The PREA review team will consist of the Jail Administrators, PREA Coordinator, PREA managers, a member of the mental health and medical staff and the audits and contract staff. The PREA review team will allow input from line supervisors, investigators, and medical or mental health practitioners. The review team shall: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; Assess the adequacy of staffing levels in that area during different shifts; Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and Prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement. This report shall be submitted to the Sheriff and PREA compliance manager. The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.</p> <p data-bbox="252 1301 1477 1928">An interview with an administrative staff and documentation review of the investigation reports confirmed that a Sexual Abuse Incident Review Form is prepared upon completion of sexual abuse or sexual harassment investigations. The Incident Review consists of policy or procedure requiring revision, motivation for incident or allegation, assessment physical barriers in the area; adequacy of staffing levels and assessment of monitoring technology and recommendation for improvements. The Incident Review Team consisted of the Jail Administrators (Chief), PREA Coordinator, PREA managers, a member of the mental health and medical staff and the audits and contract staff. The facility reported forty-eight (48) administrative/criminal investigations of alleged sexual abuse and sexual harassment allegations that occurred in this facility in the past twelve (12) months. Staff interviews confirmed their knowledge of the process and would document their review on the Sexual Abuse Incident Review Form that captures all aspects of an incident. The auditor reviewed seventeen (17) investigation files with the corresponding Incident Reviews, meeting the requirements of the standards. This auditor also, reviewed monthly incident reviews uploaded on the PREA OAS ranging in date from May 2019-September 2020.</p> <p data-bbox="252 1973 1430 2085">Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the PREA managers shall collect accurate, uniform data for every allegation of sexual abuse at each facility under its direct control using forms PS MED A-G. The PREA coordinator shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The PREA coordinator will formulate a report outlining sexual abuse reports at least annually and submit it to the Sheriff for approval. Upon request, the PREA coordinator shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>Documentation review of Henrico County Sheriff's Office 2019 Annual Report revealed comprehensive information about PREA, to include statistical data regarding reports of sexual abuse and sexual harassment, were included. The Henrico Sheriff's Office website has annual PREA reports beginning in 2015 available for public review.</p> <p>The auditor reviewed the 2019 Survey of Sexual Victimization, Local jail Jurisdictions Summary Form completed and submitted by the PREA Coordinator on behalf of Henrico Sheriff's Office.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the PREA review team shall review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training including by: Identifying problem areas; Taking corrective action on an ongoing basis; and Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.</p> <p>An interview with the PREA Coordinator revealed that information is gathered and submitted to the public through an annual report that is available on the website and includes comparison data and any facility modifications or agency policy changes. Also, the PREA Coordinator reports that all information collected from an incident review is forwarded to Sheriff for review and or approval. The Sheriff confirmed that information obtained during the incident reviews are used to enhance the PREA program to prevent, detect and respond to incidents of sexual abuse and sexual harassment.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>A review of Henrico County Sheriff's Office, Policy 4D-22-8, PREA Standards and Procedures effective date July 2019, with an updated effective date of December 2020, mandates the agency shall ensure that data collected pursuant to §115.87 are securely retained. The agency shall make all aggregated sexual abuse data, from both Jail West and Jail East along with private facilities with which it contracts, readily available to the public at least annually through the agency website. Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed. The agency shall maintain sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p>The aggregated sexual abuse data was reviewed, and all personal identifiers are removed. Henrico County Sheriff's Office 2019 Annual Report is posted on the Henrico County Sheriff's Office website and readily available for public review.</p> <p>An interview with the PREA Coordinator reported that all information is securely maintained in an area where only the PREA Coordinator, PREA Manager, Chief has access.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This auditor reviewed Henrico County Sheriff's Office web page at https://www.henrico/sheriff/ containing the 2017 & 2019 PREA Audit Report for both facilities operated by Henrico County Sheriff's Office. Both jails first PREA audit was conducted during the third year of the first three-year audit cycle. Then again during the third year of the second three-year audit cycle. Therefore, one third of Henrico County Sheriff's Office facilities were not audited each year of the three (3) year audit year. Due to COVID-19 and Executive Orders 51 issued by the Governor of Virginia on March 12, 2020, Jail East could not conduct the PREA Audit initially scheduled for May 18-20, 2020. Therefore, the agency was unable to have one third of it facilities audited during the first year of the third, three year audit cycle, for full compliance with the one third rule.</p> <p>This auditor and consultant had access to the entire facility and were able to conduct staff and inmate interviews in a private area and provided with documentation in accordance with the standard. Inmates were permitted to send confidential information or correspondence to this auditor, the same method as sending to their legal counsel. Posters (pre-audit notices) for communicating to the auditor were in all areas of the facility.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This auditor reviewed Henrico County Sheriff's Office web page at https://www.henrico/sheriff/ containing the containing the 2017 & 2019 PREA Audit Reports for both facilities operated by Henrico County Sheriff's Office. Pre staff the audit report was published within 90 days after the final report was issued by the auditor.</p> <p>Based on the review of the agency policy and procedures, observations and information obtained through staff and inmate interviews, and review of documentation, the facility has demonstrated compliance with this standard.</p>

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

	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, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

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

115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual	yes

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

115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes

115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes

115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

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

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

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

115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

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

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

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

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

115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

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

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

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

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

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

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

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes

115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes

115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na

115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

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

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

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

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

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

115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

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

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

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