

PREA Facility Audit Report: Final

Name of Facility: Graceville Correctional Facility

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/27/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Debra D. Dawson	Date of Signature: 07/27/2022

AUDITOR INFORMATION	
Auditor name:	Dawson, Debra
Email:	dddawsonprofessionalaudits@gmail.com
Start Date of On-Site Audit:	06/27/2022
End Date of On-Site Audit:	06/29/2022

FACILITY INFORMATION	
Facility name:	Graceville Correctional Facility
Facility physical address:	5168 Ezell Road, Graceville, Florida - 32440
Facility mailing address:	

Primary Contact	
Name:	Beverly McMullen
Email Address:	beverly.mcmullen@mtctrains.com
Telephone Number:	662-629-1328

Warden/Jail Administrator/Sheriff/Director	
Name:	Scott Middlebrooks
Email Address:	scott.middlebrooks@mtctrains.com
Telephone Number:	850-263-5500 ext. 10

Facility PREA Compliance Manager	
Name:	Misty Horn
Email Address:	misty.horn@mtctrains.com
Telephone Number:	O: 850-263-5500
Name:	Beverly McMullen
Email Address:	beverly.mcmullen@mtctrains.com
Telephone Number:	O: 662-629-1328

Facility Health Service Administrator On-site	
Name:	Terry Edwards
Email Address:	terry.edwards@mtctrains.com
Telephone Number:	850-263-5500 ext.

Facility Characteristics	
Designed facility capacity:	2009
Current population of facility:	1869
Average daily population for the past 12 months:	1876
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	19-84
Facility security levels/inmate custody levels:	medium / close custody
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	212
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	12
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	57

AGENCY INFORMATION	
Name of agency:	Management & Training Corporation, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	500 N. Marketplace Drive, Centerville, Utah - 84014
Mailing Address:	
Telephone number:	801-693-2600

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

Agency-Wide PREA Coordinator Information			
Name:	Heather Manuz	Email Address:	heathermanuz@gmail.com

SUMMARY OF AUDIT FINDINGS	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-06-27
2. End date of the onsite portion of the audit:	2022-06-29

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Panhandle Forensic Nurse Specialist, Inc (SANE); Gulf Coast Children Advocacy Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	2009
15. Average daily population for the past 12 months:	1876
16. Number of inmate/resident/detainee housing units:	24
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1866
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	61
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	7
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	29

41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	36
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	36
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	97
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	15
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	7
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	317
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	57
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	9
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	30
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The selection of inmates were chosen from rosters that provided various information at the request from the auditor and was selected as such.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	22
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	2

62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	3
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	3
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	1
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	5
66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Interviews with several staff and the inmate population
67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	3
68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	3
69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of investigative cases and inmates who reported sexual abuse</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>21</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>race and gender</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>24</p>

<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

<p>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Agency contract administrator <input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment <input type="checkbox"/> Line staff who supervise youthful inmates (if applicable) <input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable) <input checked="" type="checkbox"/> Medical staff <input checked="" type="checkbox"/> Mental health staff <input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches <input checked="" type="checkbox"/> Administrative (human resources) staff <input checked="" type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff <input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations <input checked="" type="checkbox"/> Investigative staff responsible for conducting criminal investigations <input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness <input checked="" type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation <input checked="" type="checkbox"/> Staff on the sexual abuse incident review team <input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation <input checked="" type="checkbox"/> First responders, both security and non-security staff <input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other
<p>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</p>	<ul style="list-style-type: none"> <input checked="" type="radio"/> Yes <input type="radio"/> No
<p>a. Enter the total number of VOLUNTEERS who were interviewed:</p>	<p>1</p>

b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

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

Documentation Sampling

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

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

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	13	0	13	0
Staff-on-inmate sexual abuse	2	1	1	1
Total	15	1	14	1

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	4	0	4	0
Staff-on-inmate sexual harassment	1	0	1	0
Total	5	0	5	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	8	0	5	0
Staff-on-inmate sexual abuse	2	0	0	0
Total	10	0	0	0

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	4	0
Staff-on-inmate sexual harassment	0	1	0	0
Total	0	1	4	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	5
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)

Inmate-on-inmate sexual abuse investigation files

100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	4
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<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>5</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>

<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>
<p>SUPPORT STAFF INFORMATION</p>	
<p>DOJ-certified PREA Auditors Support Staff</p>	
<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>Non-certified Support Staff</p>	
<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</p>	<p>1</p>
<p>AUDITING ARRANGEMENTS AND COMPENSATION</p>	
<p>121. Who paid you to conduct this audit?</p>	<p> <input type="radio"/> The audited facility or its parent agency <input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) <input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm) <input type="radio"/> Other </p>
<p>Identify the name of the third-party auditing entity</p>	<p>Correctional Management and Communication Group</p>

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
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1088 696" style="list-style-type: none"> <li data-bbox="242 327 1088 356">1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 383 1054 412">2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons <li data-bbox="242 439 715 468">3. Confirmation PREA Coordinator Assignment <li data-bbox="242 495 549 524">4. GRFC Organizational Chart <li data-bbox="242 551 379 580">5. Interviews: <ol data-bbox="242 607 512 696" style="list-style-type: none"> <li data-bbox="242 607 512 636">a. MTC PREA Coordinator <li data-bbox="242 663 624 696">b. GRFC PREA Compliance Manager <p data-bbox="242 730 1485 958">115.11 (a) (b) (c) In accordance with MTC #903E.02, the policy outlines procedures and expectations that mandates a zero-tolerance toward all forms of sexual abuse and sexual harassment. MTC's approach to preventing, detecting and responding to allegations of sexual abuse and sexual harassment included within the policy that demonstrates an aggressively response to, investigate, and support the prosecution of incidents of sexual violence in all MTC operated prisons, through internal administrative discipline processes and external partnership with law enforcement and county prosecutors. Sexual contact between staff and offenders, volunteers, and offenders or contract personnel and offenders, regardless of consensual status is prohibited and subject to administrative and criminal disciplinary sanction.</p> <p data-bbox="242 987 1477 1081">Any staff member who is found to have perpetrated sexual abuse or sexual harassment will be discipline in accordance with agency Employee Discipline and subject to employment termination in addition to subject to criminal prosecution as applicable.</p> <p data-bbox="242 1111 1461 1173">Any inmate, detainee or resident who is found to have perpetrated sexual abuse or sexual harassment will be discipline as outlined in MTC policy and subjected to criminal prosecution as applicable.</p> <p data-bbox="242 1202 1485 1599">Pursuant to MTC #903E.02, MTC will designate an upper-level PREA Coordinator for the company who has sufficient time and authority to develop, implement and oversee MTC's efforts to comply with PREA standard in all facilities. An interview was conducted with the MTC PREA coordinator who confirmed, MTC operates 29 facilities and a PREA Compliance Manager is assigned at each. An Assistance PREA Coordinator is also assigned within the agency to assist in the monitoring of compliance with each facility. There are four regions, and each has a Regional Director who also assists in monitoring for PREA compliance. Upon the discovery of any concerns in meeting and/or maintaining compliance of any standard, notification is shared with all to include the affected facility's Warden and a development of corrective measures would be implemented to ensure compliance is adhered to. This includes the review of policies, procedures, identifying available resources, reviewing the frequently asked questions within the PREA Resource Center, reaching out to the PREA Resource Center for assistance as needed, and conducting follow-ups to restore compliance. Internal audits are completed by herself and the MTC Assistant PREA Coordinator while reviewing the agency's internal data system that allows them to be knowledgeable of PREA related data such as reported PREA allegations, risk screenings, and other information.</p> <p data-bbox="242 1628 1461 1789">MTC #903E02, includes the agency's requirement to designate a PREA Compliance Manager who has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. An interview with GRFC PREA Compliance Manger indicated she ensure her duties as the PREA Compliance Manager are fulfilled daily as the protection of inmates from sexual abuse and sexual harassment is a priority of all staff and the facility. The GRFC PREA Compliance Manager reports directly to the Warden.</p> <p data-bbox="242 1818 1477 1912">Based on the review of MTC policy, review of the MTC organizational chart, GRFC organizational chart and interviews with the GRFC PREA Compliance Manager and MTC PREA Coordinator, it is determined that GRFC does meet all provisions of the standard.</p>

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Memorandum submitted by the MTC PREA Coordinator <p>Interviews:</p> <ol style="list-style-type: none"> a. Florida Department of Corrections Contract Monitor b. GRFC/MTC Warden c. GRFC/MTC PREA Coordinator d. MTC Regional Vice-President <p>115.12 (a) (b) The GRFC does not have authority to contract with other entities for the confinement of inmates. The authorizing contract that allows for the confinement of offenders at GRFC is between the Florida Department of Corrections and the Management & Training Corporation (MTC). MTC is a private contracting organization that does not contract for the confinement of inmates and has the delegated authority with direct responsibility for the operation of facilities that confine inmates and detainees. The contract became effective September 1, 2021.</p> <p>Per interviews with the MTC Regional Vice - President, GRFC PREA Coordinator, and GRFC Warden, GRFC is under contract with the Management & Training Corporation through the Department of Management Services and therefore, is not authorized to contract with other agencies for the confinement of its inmates. GRFC meets all provisions of this standard.</p>

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. GRFC Staffing Plan Review
4. Security Daily Rosters
5. Documentation of Unannounced Rounds
6. Interviews:
 - a. GRFC Warden
 - b. GRFC PREA Compliance Manager
 - c. MTC PREA Coordinator
 - d. Intermediate and Higher-Level Supervisors

115.13 (a) (b) (c) (d) In accordance with MTC 903E.02, MTC facilities will develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect inmates against abuse. The facility presented a staffing plan that confirms its operation to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and video monitoring, to protect inmates against abuse. The staffing plan was developed for a daily inmate population of 1884. The average daily inmate count since September 1, 2021, has been 1876. All elements within the standard were included in the review of the Staffing Plan.

Interviews with Warden and PREA Compliance Manager confirmed MTC was awarded the contract bid for operation of the GRFC to begin on September 1, 2021. A Staffing Plan was developed to ensure an adequate staffing level is always maintained during each shift to protect inmates from sexual abuse and video monitoring is a major role of providing protection. The facility's staffing plan includes video monitoring as part of the staffing plan in addition to all elements within the standard provision that are considered during the development and review. A total of 177 cameras are located throughout the facility to include all housing units, visitation area, medical, education, hallway, library, administration area, security hallway, food service, intake area, laundry, barber shop, recreation area and fences. Staff conduct regular walk through to identify and eliminate possible blind spots, consider the inmate population changes, programming, reported PREA allegations, investigative findings, placement of staff, and an annual review of sexual abuse comparison. Per the Warden, he does have a plan to add additional cameras upon budget approval. Management staff does ensure compliance through the daily review of the security staff roster assignments. Although there continues to be a shortage of security staff, the increase in salary has been beneficial in the increase of applicants in addition to the allotted overtime available to certified officers.

In accordance with MTC 903E.02, Each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. The auditor reviewed security rosters as the following for compliance with the Staffing Plan: First Monday of even months for shift 7:00 a.m. – 7:00 p.m.; Second Saturday for odd months shift 7:00 p.m. – 7:00 a.m. No discrepancies were noted in the assignment of security posts identified as critical/mandatory. Adjustment in roster assignments were made that included overtime compensation that ensured required coverage was provided. Per the Warden, and a review of the randomly selected daily security rosters, the facility has not incurred any instances in which the facility has not maintained compliance with the staffing plan. Overtime is always utilized in providing coverage as needed for vacate positions.

In accordance with MTC 903E.02, At least once every year the facility, in collaboration with the PREA coordinator, reviews the staffing plan to see whether adjustments are needed in (a) the staffing plan, (b) the deployment of monitoring technology or (c) the allocation of agency/facility resources to commit to the staffing plan to ensure compliance. The facility will document the review on the Annual Staffing Plan Review Certification and submit it to the MTC PREA Coordinator and Regional Vice President. MTC was awarded the contract for the GRC with an effective date of operational authority on September 1, 2021. The facility staffing plan was documented as reviewed by the GFC PREA Compliance Manager and GFC Warden on December 16, 2021, with a final review by the MTC PREA Coordinator on December 27, 2021. An interview with the MTC PREA Coordinator indicated all facilities are required to conduct an annual review of their staffing plan and she

is included in the review process. Additionally, she would be informed of any charges to the staffing plan as they are being eliminated.

In accordance with MTC 903E.02, Intermediate-level and high -level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such practice shall be implemented and documented for night shifts as well as day shifts, Staff shall not alert other staff of the conduct of such rounds. The auditor conducted reviews of all housing units logs for confirmation of intermediate-level and high-level staff unannounced rounds. Security rounds were documented as being conducted by the various levels of security supervisory staff and noted as Security and PREA inspections that included their date of arrival, arrival time and departure time. These rounds were documented as completed on all three shifts at various times. Interviews with supervisory staff indicated the completion of unannounced rounds are not conducted in pattern, as the time of the rounds vary from day to day. Additionally, unannounced rounds are also conducted by various supervisory staff throughout each shift. Staff identified as notifying others of supervisory rounds would initially receive counseling followed by disciplinary actions for repeated occurrences.

Based on the review of the GRFC Staffing Plan that identified all elements within the standard, selected security roster assignments with no instances of non-compliance with the staffing plan, review of unannounced supervisory rounds, and interviews with GRFC Warden, GRFC Compliance Manager, MTC PREA Coordinator and GRFC supervisory staff, GRFC does meet all provisions of the standard.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons (PREA) 3. Site Observation 4. Interviews: <ol style="list-style-type: none"> a. GFC PREA Compliance Manager <p>115.14 (a) (b) (c) GFC is an adult prison and does not house juvenile offenders. Per the PAQ and interview with the GRC PREA Compliance Manager, offenders designated at GFC are beyond the ages of 19 – 84 years old. However, MTC does have a policy in place for holding juveniles.</p> <p>In accordance with MTC 903E.02, Youthful inmate means any person under the age of 18 who is under adult court supervision and incarcerated or detained in prison or jail. Youthful detainees mean any person under the age of 18 who is under adult court supervision and detained in a locked-up prison.</p> <p>MTC prohibits placing youthful inmates in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. In areas outside of housing units, MTC shall either (1) maintain sight and sound separation between youthful inmates and adult inmates, or (2) provide direct staff supervision when youthful inmates and adults have sight, sound, and physical contact. Facilities will make best efforts to avoid placing youthful inmates in isolation to comply with provision.</p> <p>Based on the review of MTC policy, GFC PAQ, observation during the site-visit, and interview with the GFC PREA Compliance Manager, it is determined GFC meets all provisions of the standard.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) # 903E.02 Sexual Safety in Prisons
3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response
4. Search Training Lesson Plan
5. Documentation of Completed Search Training
6. Interviews:
 - a. Random Security and Non-Security Staff
 - b. Random and Targeted Group Inmates

115.15(a) (b) (c) (d) (e) (f) In accordance with MTC #. 903E.02 The facility will not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. (b)The facility will not permit cross -gender pat down searches of female inmates, absent exigent circumstances. The facility will document all cross gender strip searches, cross-gender visual body cavity searches, and cross gender pat searches of female inmates.(c) Facility shall not restrict females inmates access to regularly available programming or other out-of-cell opportunities in order to comply with provision.(d) The facility will enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstance or when such viewing is incidental to routine cell checks. The facility will maintain a log of exigent circumstances. The facility will develop a system by which staff of the opposite gender shall announce their presence when entering an inmate housing unit. (e) The facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. (f) Security staff shall be trained in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

There were zero reported non-medical staff involved in cross-gender strip and/or visual searches during the management operation of GRFC.

GRFC is an adult male facility only and does not house female inmates, therefore these provisions are not applicable.

FDC #602.053 indicates an inmate who has identified as transgender and or intersex during the STI assessment shall be given the opportunity to shower separately from other inmates. There were zero inmates identified as transgender and/or intersex during the review period and none during the site visit. All showers have individual stalls with a barrier that provide privacy from the common area. Interviews with GRFC staff that included security, non-security and the inmate population, inmates identified as gay, and bi-sexual area also allowed to shower separately from other inmates. Inmates identified as such are allowed to shower when other inmates are ordered to remain in their cells during count time. Interviews conducted with both random and targeted group inmates confirmed, there were no concerns with being observed by staff of the opposite gender when showering, changing clothes and/or performing bodily functions.

MTC#903E.02 include agency's policy that the searching of transgender and/or intersex inmates for the sole purpose of determined the inmate's genital status is prohibited. This policy includes the requirement of staff's completion of training on how to conduct searches of cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner and in the least intrusive manner possible, consistent with security needs. However, interviews with staff confirmed their understanding that such searches are prohibited. Staff also acknowledged the completion of search training that included the searching procedures within the provision during searches of transgender and intersex inmates. There were no inmates identified as transgender and/or intersex housed at GRFC during the management of MTC or during the site visit for interview. A copy of the search training lesson plan and confirmation of completion by security staff was provided for review.

Based on the review of agencies policies, observation during the site visit of showers and restroom area usage for the inmate population, interviews with staff and the inmate population, review of search training lesson plan and documentation of staff's completion, GRFC does meet all provisions of the standard.

115.16 Inmates with disabilities and inmates who are limited English proficient

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

- 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
- 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
- 3. Florida Department of Corrections #602.053 Prison Rape: Prevention, Detection, and Response
- 3. Agreement Between MTC and Global Tel Contract TTY
- 4. Confirmation of Staff American Disability Act Training
- 5. Assigned Staff Interpreters
- 6. Language Line Services Contract
- 7. PREA Material in Spanish Language

Interviews:

- a. Agency Head
- b. Random Staff
- c. Limited English Inmates
- d. Inmates Identified as Deaf and Hard of Hearing
- e. Inmates Identified as Blind and Low Vision
- f. Inmates Identified with Cognitive Behavior Disabilities
- g. Inmates with Physical Disabilities

115.16 (a) (b) (c) Per MTC #903E.02, MTC will take appropriate steps to ensure inmates with disabilities and who are limited English proficient have an equal opportunity to participate in or benefit from all aspects of MTC's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. i) Contracting with interpreters or other professionals (including designated facility staff) hired to ensure effective communication with inmates who are Limited English Proficient. ii) Developing written materials used to effectively communicate about PREA with inmates with disabilities or limited reading skills. iii) Training staff on PREA complaint practices for inmates with disabilities. For PREA related activities,

Pursuant to FDC #602.053, Inmates with recognized disabilities and Limited English Proficiency (LEP) shall be advised of the Department's zero tolerance policy on sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment in accordance resources outlined in "American with Disabilities Act Provisions for Inmates." Resources identified for inmates with disabilities include 2) closed captions (deaf/hard of hearing); b) large print material (impaired vision); c) reading of materials to inmate(s) by staff (blind /limited mental capacity); d) the Department translator List (LEP); and e) Language Line services (LEP). LEP inmates should be provided PREA education in their primary language. Confirmation of resources for inmates with disabilities offered at GRFC was identified as the following: Language line that provides insight video interpretation; Language Line Services for Spanish and all other foreign languages; GRFC staff who provides translation for Spanish speaking offenders; GRFC staff who provides sign language; PREA education presented in the inmate population in both the English and Spanish languages; PREA educational video in closed captions; the availability of PREA education in large font, and the completion of American Disability Act Training.

Per MTC #903E.02 For PREA related activities, MTC prohibits the use of 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 the first-response duties under 115.64, or the investigation of the inmate' allegations. Interviews with random staff confirmed their knowledge of the agency's policy to not use inmates to interpret for other inmates who are reporting and/or investigating PREA allegations. All stated they would contact a supervisor and translation services would be performed by an identified staff member or using the Language Line. Per the review of the PAQ and interviews with staff, there were zero instances where an inmate was utilized to translate for another inmate when reporting and/or investigating PREA allegations.

Per the Agency Head, MTC take appropriate step to prevent, and detect, and respond to sexual abuse and sexual harassments that include Language Line Services, Inc., or other professionals including designated facility staff, who are hired to ensure effective communication with inmates who are limited English proficient. Developing written material are used for effective communication about PREA with inmate with disabilities or limited reading skills. Staff receive training on PREA compliance practices for inmates with disabilities. For PREA related activities, MTC prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay obtaining an effective interpreter could compromise the inmate's safety

Interviews were conducted with inmates identified with the various disabilities: 1 – blind; 2- low vision; 1 – deaf; 1 - Limited English Proficiency; 2 – with physical disabilities; and 2- as a cognitive behavior disability. All inmates confirmed receiving PREA education in a method they were able to understand.

The facility identified 36 inmates housed at the facility Limited English Proficient (LEP). A staff member provided translation in the Spanish language for one inmate identified as LEP during an interview with the auditor. He stated a staff member was provided to explain PREA education to him during intake and orientation in addition to observing the PREA video in his Spanish language and given a facility handbook, in addition to other PREA material in his Spanish language that includes PREA posters throughout the facility.

The facility identified 36 inmates as deaf and /or hard of hearing while 3 are identified as deaf and 33 are identified as hard of hearing. An interview was conducted with one identified as deaf and two inmates identified as hard of hearing. The facility employs numerous staff who are certified to provide sign language services for the inmate population. A staff member assisted the auditor during the interview process by providing sign language services during the interview with the deaf inmate. He identified a staff member was assigned to provide sign language services during the delivery of PREA education and throughout the intake and risk screening. He added, he was and continues to be able to read and understand the written PREA material given to him and posted throughout the facility.

Interviews conducted with two inmates identified as cognitively disabled, confirmed they were able to understand through the delivery of information delivered to them while speaking slowly and clearly. Both inmates stated they understood the PREA education provided to them during intake and orientation in addition to the PREA posters throughout the facility.

Twenty-nine inmates were identified as blind or having low vision (visually impaired). Interviews were conducted with one inmate identified as blind and two identified with low vision. The inmates confirmed staff provided verbal PREA education to them and in addition to their ability to listen to the presentation of the PREA video provided.

The facility identified 61 inmates with physical disabilities. Two were selected for interviews as such. Both inmates acknowledged their receipt of PREA education in a manner they were able to fully understand through the delivery of presentations by staff, the facility handbook, PREA posters throughout the facility and observation of the PREA video.

Based on the review of agencies policies, observation during the site visit, interviews with inmates within various disabilities, agencies available resources to assist inmates within the standard provision, interviews with staff, GRFC does meet all provisions of the standard.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. Florida Department of Corrections (FDOC) #208.049 Background Investigation and Appointment of Certified Officers CMTA Serial No. 903E.02 Sexual Safety in Prisons (PREA)
4. Employee's Contractors' and Volunteers Background Checks
5. New Hires and Promoted Staff PREA Verification Forms
6. Interview:
 - a. Human Resource Manager

115.17 (a) (b) (c) (d) (e) (f) (g) (h) The MTC #903E.02 and FDC #208.049, outlines the agency's policies and procedures to ensure criminal background checks are conducted on all new hires to include contractors and volunteers prior to approving employment. Agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who: (1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity facilitated by force, overt or implied threats of force, or coercion. The policies also prohibit the promoting of staff who have contact with inmates who have engaged in sexual abuse and/or sexual harassment. Facilities shall either conduct criminal background records checks at least every five years for current employees who may have contact with inmates or have in place a system for otherwise capturing such information for current employee. Contractors having contact with inmates, require a background check before enlisting services and every five years of continued service in accordance with MTC. Material omissions or the provision of materially false information by staff is also prohibited as outline in MTC # 903E.02.

MTC became the managing official for GRFC on September 1, 2021. Prior to this date, the facility and staff were managed under GEO. MTC required all staff previously employed through GEO to submit an application and completion of a background check for continued employment with MTC (317 employees). This procedure was confirmed through interviews with the Warden, GRFC PREA Compliance Manager, and random and specialized staff, who confirmed during the interview process, they were required to complete the application and background check process to remain employed at the Graceville Correctional Facility under the new management of MTC. An interview with the human resource administrator indicated a criminal background check is completed on all new hires to include contractors and volunteers prior to hiring. The human resource staff complete the fingerprints of the applicants via the LiveScan system, at the facility. The prints are routed to the Department of Management Service (DMS) through Florida Department of Law Enforcement (FDLE). The DMS completes the background check and then forwards it back to MTC. The DMS is the authorizing approval for hiring. Six months prior to the 5-year anniversary of all staff, an additional background check is completed. The background checks for volunteers are initiated by the Religious Services Chaplain and are completed by the Classification Officer and/or Classification Supervisor who has access as such required. Background checks for contractors are completed through the DMS and Live Scan for fingerprints. All staff are required to self-report any instances of arrest. Additionally, an alert is automatically generated that notifies DMS of an employee's arrest not later than the following day.

The agency utilizes the NCIC system for the review of previous criminal history of applicants and during the 5-year background checks. The same procedures for conducting background checks are completed for staff who request promotions. All applicants to include new hires and those seeking promotions are required to complete the PREA questions acknowledging whether the employee has any substantiated allegations of sexual abuse; has the employee resigned during any pending investigation of an allegation of sexual abuse; does the employee have any substantiated allegation of sexual harassment and whether the employee resigned during any pending investigation of sexual harassment. The review of 16 MTC new hires, three (3) contractors, four (4) volunteers and six (6) staff promotions confirmed the staff's completion of the PREA questions as identified within the standard and the completion of the PREA Verification identifying a "No" response. Per the human resource administrator, all staff are also required to complete the PREA Verification questionnaire annually upon their anniversary date of employment. human

Based on the review of the agency's policies, review of completed background checks for MTC employees, contract staff and volunteers, confirmation of completed PREA Verification questionnaires by new hires, contractors, volunteers and staff promoted, the facility does meet all provisions of the standard.

115.18	<p>Upgrades to facilities and technologies</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons <p>115.18 (a) (b) Per Accordance #903E.02, When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, MTC will consider the effect of the design, acquisition, expansion, modification upon the agency to protect inmates from sexual abuse. Per the Agency Head, stakeholders, include that the MTC PREA Coordinator and the Assistant Coordinator, review the facility’s plans to determine appropriate staffing g and camera coverage during the design or renovation phase of the facility The process anticipates blind spots and mitigates risk through efficient design.</p> <p>MTC 903E.02, When installing or updating a video monitoring system, electronic surveillance system or other monitoring technology MTC will consider how such technology may enhance the facility’s ability to protect inmates from sexual abuse. One hundred and seventy-seven cameras are strategically located in all housing units, visitation area, medical, mental health, education hallway, library, administration area, security hallway, food service, intake area, laundry, barber shop, recreation area and fences.</p> <p>Per the Agency Head, MTC uses video monitoring to assist staff to observe inmate activity in areas particularly vulnerable to misbehavior or violence. Priority to camera placement is primarily influenced by areas of increased risk and any prevalence of substantiated and unsubstantiated incident of sexual abuse.</p> <p>An interview conducted with the Warden indicated there has not been any substantial expansion or modification of the existing facility since resuming operation on September 1, 2021. Additionally, there has not been an update to video monitoring system, electronic surveillance system or other monitoring technology. He added; however, any modifications, expansion and video monitoring would be made in consideration with providing the safety of inmates from sexual abuse.</p> <p>Based on the review of MTC policy, observation and interviews with the Warden, Agency Head and staff, GRFC meets all provisions of the standard.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations 4. Sexual Abuse Case Files <p>Interviews:</p> <ol style="list-style-type: none"> a. SANE at Panhandle Forensic Nurse Specialist, Inc. b. OIG Investigator c. GRFC PREA Compliance Manager d. Inmates Who Reported Sexual Abuse <p>115.21 (a) (b) (c) (d) (e) (f) (g) (h) The FDC #108.015 and MTC #903E.05 policies outline the procedures for the completion of both administrative and criminal investigations. MTC is responsible for investigating allegations of sexual abuse, MTC will follow a uniform evidence protocol that maximizes the potential for obtaining suitable physical evidence for administrative proceedings and criminal prosecutions and developmentally appropriate for youth where applicable. The Office of the Inspector General is a department through the Florida Department of Corrections and is responsible for conducting all sexual abuse investigations both administrative and criminal. MTC/GRFC is contracted through the Florida Department of Corrections. The MTC/GRFC Investigator aids the OIG Investigator upon request. Interviews were conducted with an OIG Investigator and the MTC/GRFC Investigator. The OIG Investigator explained various training in conducting sexual abuse investigations in a confinement setting that far exceeds the requirement of standard 115.34 specialized PREA training. Training also includes a 3-day training course and with an outside agency in addition, a 12-hour investigative techniques and annual refresher PREA: Conducting Sexual Abuse Investigations in a Confinement setting course through the National PREA Resource Center. The Inspector's investigation responsibilities/ uniform protocols are outlined FDC#108.015 and are followed throughout each sexual abuse investigation. Interviews with random staff confirmed their understanding of the agency's protocol upon becoming informed of a reported sexual abuse allegation, and their responsibility to apply first responder duties in the preservation of physical evidence by giving directions to the inmate victim and aggressor as applicable. The protocols were reviewed and determined to be in line with the DOJ's National Protocol for Sexual Assault Medical Forensic Examination.</p> <p>GRFC has an agreement with the Panhandle Sexual Assault Response Team (SART) to provide SANE examinations at the GRFC. Upon the notification and arrival of the on-call OIG Investigation, the OIG Investigator requested a SANE from the SART to report to GRFC for the completion of forensic examination. Three forensic examinations were completed by the SART (SANE) during the 8-month review period. These are offered to the victims of sexual abuse without financial cost to the victim. Documentation was presented for confirmation of six (6) SANE Nurse qualifications with the Panhandle Sexual Assault Response Team. An interview with a SANE Nurse with the Panhandle Forensic Nurse Specialist, Inc., (SART) confirmed upon being notified by the OIG Investigator at GRFC, the on-call SANE Nurse reports to the facility and conducts the forensic examination. A SANE Nurse is available 24-7 to conduct the forensic examination upon notification and they are required to report to the facility within four (4) hours of being notified, to complete the examination.</p> <p>MTC/GRFC and the Gulf Coast Children's Advocacy Center, Inc. entered a contract effective as of April 21, 2022, and may be renewed annually. The Gulf Coast Children's Advocacy Center, Inc., is the administrator of the Gulf Coast Sexual Assault Program (a certified rape crisis center). A certified victim advocate from the Gulf Coast Children's Advocacy Center, Inc. is assigned to report to the facility for advocacy accompaniment during sexual assault forensic exams. Per the OIG investigator, the inmate victim is immediately given Sexual Abuse Awareness, NII120, and advised of their right to access crisis intervention services to have a forensic examination and to have a victim advocate present during the forensic examination and /or the investigative interview if they choose to. She continued in stating, if the inmate elects to have a victim advocate, she immediately ceases questioning the victim until the arrival of the victim advocate. Although a victim advocate is always offered to victims of sexual abuse/assault by the OIG Investigator, the facility also has staff who are qualified to serve as a victim advocate. Mental health staff have education qualifications of Psychologist and Licensed Mental Health Professionals who offer services as a victim advocate. The GRFC PREA Compliance Manager acknowledged the MOU</p>

between the facility and the Gulf Coast Children's Advocacy Center, Inc. and the availability of a victim advocate 24/7. The facility's victim advocates also conduct follow-up services with the victim in addition to services provided within the MOU. Interviews conducted with three (3) who reported sexual abuse, confirmed they were offered a victim advocate at the initiation of services upon reporting sexual abuse but declined the services. The investigative case files document the offer, refusal and/or acceptance of a victim advocate.

Based on the review of agency policies, review of sexual abuse case files, MOU with Gulf Coast Children's Advocacy Center, Inc., interviews with inmates who reported sexual abuse, OIG Investigator, GRFC PREA Compliance Manager, SANE, GRFC does meet all provisions of the standard.

115.22	Policies to ensure referrals of allegations for investigations
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1385 501" style="list-style-type: none"> <li data-bbox="242 327 1086 356">1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 383 1054 412">2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons <li data-bbox="242 439 1385 501">3. Florida Department of Corrections (FDC) #108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations <p data-bbox="242 533 352 562">Interviews:</p> <ol data-bbox="242 589 512 734" style="list-style-type: none"> <li data-bbox="242 589 405 618">a. Agency Head <li data-bbox="242 645 435 674">b. OIG Investigator <li data-bbox="242 701 512 730">c. MTC/GRFC Investigator <p data-bbox="242 761 1458 958">115.22 (b) MTC #903E.02, Pursuant to MTC 903E.02, MTC requires allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations unless the allegation does not involve potentially criminal behavior. Facilities will document all referrals of allegations of sexual abuse or sexual harassment for criminal investigation. If administrative criminal investigations of alleged sexual abuse are performed by an entity other MTC efforts will be made to obtain the agencies investigative policy. MTC will make the entity aware of investigating requirements under PREA.</p> <p data-bbox="242 990 1493 1216">Per Florida Statute 944.31, the Office of Inspector General (OIG) has the legal authority to conduct both administrative and criminal investigations in Florida Department of Corrections correctional facilities to include those that are privately operated. Interviews were conducted with both the GRFC/MTC Investigator and an Office of Inspector General Investigator. Both acknowledged administrative investigations can be conducted by the institution investigator while all investigations that could possibly include criminal charges are investigated by an Investigator assigned to the Office of the Inspector General. Per the MTC Facility Investigator, she refers all allegations of sexual abuse and sexual harassment to the OIG, and the investigator is assigned by office of the OIG.</p> <p data-bbox="242 1247 1474 1473">Per the agency head, MTC investigates where the agency has authority and refers cases when it doesn't have jurisdictional authority. In these areas, MTC works with and encourages administrative or criminal investigation to be completed for all allegations of sexual abuse and/or harassment. The initial investigation begins immediately by correctional staff identified and trained as primary investigators, to ensure preservation of physical and/or circumstantial evidence. In accordance with the contract requirements, the investigative authority, such as respective Offices of Inspector General (OIG), Crime Investigations Divisions (CID) Office of Internal Affairs (OIA), local law enforcement, and /or FBI will be notified immediately and will assume control of the investigation when appropriate.</p> <p data-bbox="242 1505 1490 1767">GRFC reported a total of 20 PREA allegations during the 8-month review period under MTC operations. These investigations include 15 inmates-on-inmate sexual abuse; four (4) inmates-on-inmate sexual harassment; one (1) staff -on inmate sexual harassment. Five (5) inmates-on-inmate sexual abuse investigations and each of the five (5) sexual harassment investigations were completed during the audit phase. Each of the completed PREA investigation case files were reviewed. The remaining ten (10) inmate-on-inmate sexual abuse investigations remained open pending the completion of an investigation throughout the audit review and post audit phase. The audit received confirmation of the remaining inmate-on-inmate sexual abuse allegations in pending investigation status. Each of the remaining pending investigations were logged as such with a case number.</p> <p data-bbox="242 1798 1490 1924">A review of MTC's website lists the MTC Sexual Safety on Prisons Policy that includes the investigatory procedures for MTC. As MTC manages the operations of housing inmates assigned to the Florida Department of Corrections, the auditor confirmed the FDC website includes the agency's' policy 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations as well.</p> <p data-bbox="242 1955 1437 2016">Based on the review of agency policies, investigative case files and log, agencies website, interviews with agency head, investigative staff, GRFC does meet all provisions standard.</p>

115.31	<p>Employee training</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. FDC Bureau of Professional Development And Training ETRAIN Course Code: PREA-001 5. Employee Training Documentation 6. Interviews: <ol style="list-style-type: none"> a. Random Staff <p>115.31 (a) (b) (c) (d) MTC #903E.02 and FDC #602.053 addresses the requirements for all employees on matters related to PREA and staff's completion of PREA training. All staff shall be thoroughly trained and informed regarding the Department's zero-tolerance policy on sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment at least every two years. The facility utilizes the FDC Bureau of Professional development and Training, ETRAIN Course Code: PREA -001 that includes 20 learning objectives that meets and exceeds the standard provisions within a two-hour training credit course. MTC is a private contracting organization that was awarded the contract for management operation of GRFC with an effective date of September 1, 2021. Upon assuming operations of the facility, all current staff and new hires received PREA training under the management of MTC. The facility identified 317 staff to include part-time, full-time, and contract employees. This number includes staff previously hired under the management of GEO. Rosters were presented for confirmation of PREA training received. The auditor also randomly selected 20 security staff; 10 non-security staff; and 10 medical/mental for the employee's acknowledgement of completing PREA training and their understanding of the training presented. Interviews conducted with 21 random staff confirmed that all received PREA training under new management of MTC since September 1, 2021.</p> <p>Based on the review of agency policies that outlines the requirement of PREA training, the inclusion of PREA training as outlined in the standard provisions, and documentation of staff's completion and understanding of the PREA training received, GRFC does meet all provisions of the standard.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Employee Training Documentation 5. Interviews: <ol style="list-style-type: none"> a. Random Staff <p>115.32 (a) (b) (c) (d) MTC #903E.02 and FDC #602.053 addresses the requirements for all staff, volunteers, and contractors' completion of PREA training. All contractors and volunteers who have contact with inmates are trained on their responsibilities via the Professional Development and Training lesson plan "Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors Read and Sign, NII-127. This training is required every three years. In addition, the PREA Brochure for Interns, Volunteers, and Contractors, NII-125, will be distributed annually to all interns, contractors, and volunteers. MTC is a private contracting organization that was awarded the contract for management operation of GRFC with an effective date of September 1, 2021. Upon assuming operations of the facility, all current and new contractors and volunteers received PREA training under the management of MTC. An interview with one (1) volunteer confirmed he and other volunteers received PREA training prior to entering the facility and contact with the inmate population in addition to annually receiving the PREA training that is presented by the GRFC's Chaplain. The volunteer was fully knowledgeable of the agency' zero -tolerance policy against sexual abuse and sexual harassment and articulated his understanding of the policy and his responsibility to report immediately. Confirmation of PREA training through their signature acknowledging receipt and understanding of the PREA training was provided for each of the 29 religious services volunteers at GRFC.</p> <p>Interviews were conducted with two (2) contract staff employees. Both confirmed they conducted PREA training through their contracting agency (Trinity) on the first day of employment prior to reporting to the correctional facility. Annual refresher PREA training is completed at the facility with agency staff. Contractors acknowledged they were also required to complete refresher PREA training under the new management of MTC from September 1, 2021. Confirmation of PREA training through their signature acknowledging receipt and understanding of the PREA training was provided for each of the nine (9) (food service and librarian) contract staff at GRFC.</p> <p>A review the lesson plan confirmed the inclusion of the standard provisions with a learning goal to instruct interns, volunteers, and contract staff on the purpose and scope of the PREA with its focus to prevent, detect, and respond to all reported and suspected cases of sexual abuse misconduct. Upon completion of training, interns, volunteers, and contractors are required to acknowledge by their signature "I confirm that I have read and understand the contents of the Prison Rape Elimination Act Training for Interns, Volunteers, and Contractor." The auditor received confirmation of volunteer and 5 contractor completion of PREA training.</p> <p>Based on the review of the PREA lesson plan designed for volunteers, contractors and interns, interview both volunteers and contractors who demonstrated their knowledge of the agency's' zero-tolerance for sexual abuse and sexual harassment, and confirmation of their training, GRC does meet all provisions of the standard.</p>

115.33	Inmate education
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1294 640" style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Interviews: <ol style="list-style-type: none"> a. Intake Staff b. Random and Target Inmates <p data-bbox="242 674 1493 869">115.33 (a) (b) (c) (d) FDC #602.053 and MTC # 903E.02 address the requirements for the inmate population receipt of PREA training upon arrival during intake. The facility identified the arrival of 797 inmates during the 8-month review period. MTC was granted the contract with an effective date of September 1, 2021. An interview with intake staff confirmed all newly arriving inmates receive an inmate handbook upon their arrival that includes PREA education in addition to a briefing by staff on PREA and the agency's zero tolerance. Staff further stated inmates observe the PREA video during orientation which is scheduled for all newly arriving inmates within 14-days of their arrival.</p> <p data-bbox="242 898 1493 1256">A review of the GRFC Inmate Handbook confirmed PREA education is included on pages 41 – 42. The agency's zero-tolerance policy concerning sexual misconduct or abuse of inmates and the inmates right to be free from intimidation from inmates, staff members and any other person to perform or engage in sexual behavior regardless of their current situation and/or their sexual orientation. The inmate handbook also includes but is not limited to various methods of how to report that includes staff, grievance process, outside resources, available Hotlines numbers, advocacy center information, how to avoid becoming a victim, guidance if they are assaulted, and if they become a victim. Interviews with the 52 inmates demonstrated each and all acknowledged receiving and understanding of the agency's zero-tolerance and how to report allegations of sexual abuse, sexual harassment, and retaliation. PREA posters were observed posted throughout the facility in both English and Spanish in addition to in large font. Methods of how to report sexual abuse and sexual harassment were posted on all inmate telephones accessible to the inmate population that provided a continuous degree of awareness of the agency's zero tolerance of sexual abuse and sexual harassment.</p> <p data-bbox="242 1290 1493 1783">Interviews were conducted with 30 randomly selected inmates and 22 target group inmates, and all confirmed receiving PREA education at MTC. The target group included inmates identified as LEP, blind, low vision, deaf, hard of hearing, physically disabled, and cognitive behavior disabled. Each of these inmates confirmed the facility provided PREA education in a manner they were able to clearly understand. Inmates selected for interview included newly arrived within the 8-month review period and inmates who were housed at the facility prior to the newly operational management of MTC. Newly arriving inmates acknowledged receiving an institution inmate handbook that includes PREA information during intake and observing the PREA video during orientation within 14 days of arrival. They also stated PREA information is verbally explained by the intake staff during the intake process. Interviews conducted with the 52 inmates included those who arrived during the 8-month review period, those who transferred from other correctional facilities and those housed at GRFC for numerous years. All inmates acknowledged the receipt of PREA education upon their arrival, during orientation and in addition to the observance of the PREA video. Those inmates who were housed at GRFC prior to the administration assignment to MTC, confirmed they also received additional PREA training under the operational management of MTC from September 1, 2021. The auditor randomly selected 72 inmates from the arrival of the 797 during the review period for confirmation of receiving PREA education and all were identified as acknowledging receipt of PREA training via their signature.</p> <p data-bbox="242 1816 1493 1939">Based on the review of review of agency policy, review of inmate's arrival date and confirmation of receiving PREA training via signature, PREA education inclusion in the inmate handbook, observation of PREA video during site visit, continuous PREA education posted throughout the facility and interviews with 52 inmates and intake staff, GRFC does meet all provisions of the standard.</p>

115.34	<p>Specialized training: Investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Documentation of OIG Inspector's Specialized Training 4. Documentation of MTC/GRFC Investigator's Specialized Training 5. Interviews: <ol style="list-style-type: none"> a. OIG Investigator b. MTC/GRFC Investigator <p>115.34 (a) (b) (c) Agency policy MTC #903E.02 identified training requirements for conducting sexual abuse and sexual harassments allegations for corrections facilities under management of Florida Department of Corrections and MTC to include GRFC. All investigators are complete the PREA: Conducting Sexual Abuse Investigations in a Confinement Setting. Investigators assigned to the FDC Office of Inspector General are assigned to conduct selected administrative investigations and all criminal investigations. The facility investigator is authorized to conduct administrative investigations only upon the OIG Investigator determining no possible criminal charges are applicable. Interviews with the OIG Investigator confirmed the completion of conducting sexual abuse training within a correctional facility for OIG Investigators far exceeds the requirements of the standard provisions. Courses completed includes "PREA – In Custody Sex Crime Investigations" in addition to a 16- hour course of "PREA – Conducting Sexual Abuse Investigations in a Confinement Setting." Confirmation of the GRFC Investigator was also presented for the completion of "PREA: Conducting Sexual Abuse Investigations." The auditor reviewed confirmation of the specialized training for two (2) OIG Investigators and the GRFC Investigator. Interviews were conducted with an OIG Investigator and the GRFC, both acknowledged the training courses include the requirement of the standard provisions: techniques for interviewing sexual victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement setting; and the criteria and evidence required to substantiate a case for an administrative action or prosecution referral.</p> <p>Based on the review of policy, training documentation and interviews, GRFC does meet all provisions of the standard.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Documentation of Completed Specialized Training 4. Training Modules presented through the National PREA Resource Center 5. Interviews: <ol style="list-style-type: none"> a. Medical and Mental Health Practitioners <p>115.35 (a) (b) (c) (d) MTC 903E.02 outlines the requirements for the completion of medical and mental health practitioners as directed in all provisions of the standard. MTC will ensure that all full and part time medical and mental health care practitioners who work regularly in its facilities have been trained. Interviews with two medical staff and one mental practitioner acknowledged their completion of the specialized PREA training and identified the course modules. Documentation of the specialized training completed included the following four (4) modules: 1) Detecting and Assessing Signs of Sexual Abuse and Harassment; 2) Reporting the PREA Standards; 3) Effective and Profession Responses; 4) The medical Forensic Examination and Forensic Evidence Preservation. This course is presented through the National PREA Resource Center and meets the requirements of the PREA standard. MTC/GRFC medical staff does not conduct forensic medical examinations. These services are provided by a SANE with the Panhandle Sexual Assault Response Team from a local community. Confirmation of the 32 medical and mental health practitioners specialized training was presented for review.</p> <p>Based on the review of agency policy, specialized training modules, documented completed specialized training, and interviews with both medical and mental health practitioners, GRFC does meet all provisions of the standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (Documents, Interviews, Site Reviews)</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Florida Department of Corrections (FDC) #601.209 Reception Process-Initial Classification 5. Housing Assignments of Inmates Identified as Gay and Bi-sexual 6. Observation during site 7. Interviews: <ol style="list-style-type: none"> a. Staff who conduct Risk Screening b. MTC/GRFC PREA Manager c. MTC PREA Coordinator d. Inmates Identified as Gay and Bi-sexual <p>115.42 (a) (b) (c) (d) (e) (f) (g) (h) Agency policies FDC #602.053, FDC #601.209, and MTC#903E.02 outlines the procedures in which the facility uses information from the risk screening as required in standard 115.41 to inform housing, bed, work, education, and program assignment with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusiveness. The risk assessment process is computerized, and the information is part to FDC Inmate Behavioral Assessment Scale (IBAS). The screening instrument is objective in determining if the inmate is at risk of victimization and/or abusiveness and designed as an integrated web application that collects the required information from the Offender Based Information System (OBIS). Characteristics considered is that such as the inmates' age, criminal record, and prior identified history of sexual victimization of predation will be utilized to help determine if the inmate is at risk of future victimization of sexual abuse, sexual battery, or is at risk of committing sexual abuse or sexual battery. Information from the PREA risk screening is calculated for the determination for informing 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. Housing for transgender and /or intersex inmates will be determined on a case-by-case basis on whether to assign a transgender to a male or female facility, housing and programming assignment are based on inmates' health and safety, their own views with respect to their safety and whether the placement would present management and security concerns. The facility reported there were zero inmates identified as transgender and/or intersex at the facility during management of MTC.</p> <p>Per the MTC PREA Coordinator, the agency does not place lesbian, gay, bi-sexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status. Additionally, the agency does not have a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmate. Inmates' assignments are based on their screening only with consideration of them determined to be at risk of sexual abuse. An individual determination is made for each inmate that includes input from the inmate on the best housing for them.</p> <p>Interviews conducted with staff who conduct risk screenings, and the MTC/GRFC PREA Compliance Manager indicated there has not been any inmates identified as transgender and/or intersex at GRFC since the management of MTC. However, inmates identified as such would be reassessed bi-annually and allowed to provide input of their concerns to their own safety and programming. Staff also identified the facility does not have a concrete decree and or special wing to house transgenders. Staff who conduct risk screening inmates stated the facility has several housing units with various programs, and although the transgender/intersex inmate would be placed in a dedicated housing unit, they would be assigned to a housing unit where they felt secure. There were no inmates identified as transgender and /or intersex to interview regarding their housing assignment and/or their ability to shower separate from other inmates. However, the facility identified 97 inmates who self-reported being gay, and bi-sexual housed at the facility. Interviews were conducted with four (4) inmates who self-reported being gay and one (1) inmate who self-reported as bi-sexual. All inmates acknowledged they were issued shower passes by medical staff that allows them to shower separately from other inmates and acknowledged that they were assigned to various housing units throughout the facility, while feeling safe at the facility and in their assigned housing unit. All reported their showers are taken during the evening count when other inmates are assigned to their cell. Interviews with</p>

all staff confirmed their awareness that inmates identified as transgender, intersex, gay, bi-sexual are allowed to shower at separate times from other inmates.

Based on the review of agency policies, interviews with staff who conduct risk assessments, MTC/GRFC PREA Compliance Manager, MTC PREA Coordinator, inmates identified as gay and bi-sexual, random staff, gay and bi-sexual inmates housing assignments, observation during the site visit, GRFC/MTC does meet all provisions of the standard.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 208 451 237">Auditor Discussion</p> <p data-bbox="240 271 834 300">Evidence Reviewed (Documents, Interviews, Site Reviews)</p> <ol data-bbox="240 327 1294 927" style="list-style-type: none"> 1. Graceville Correctional Facility Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Florida Department of Corrections (FDC) #601.209 Reception Process-Initial Classification 5. Housing Assignments of Inmates Identified as Gay and Bi-sexual 6. Observation during site 7. Interviews: <ol style="list-style-type: none"> a. Staff who conduct Risk Screening b. MTC/GRFC PREA Manager c. MTC PREA Coordinator d. Inmates Identified as Gay and Bi-sexual <p data-bbox="240 958 1485 1487">115.42 (a) (b) (c) (d) (e) (f) (g) Agency policies FDC #602.053, FDC #601.209, and MTC#903E.02 outlines the procedures in which the facility uses information from the risk screening as required in standard 115.41 to inform housing, bed, work, education, and program assignment with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusiveness. The risk assessment process is computerized, and the information is part to FDC Inmate Behavioral Assessment Scale (IBAS). The screening instrument is objective in determining if the inmate is at risk of victimization and/or abusiveness and designed as an integrated web application that collects the required information from the Offender Based Information System (OBIS). Characteristics considered is that such as the inmates' age, criminal record, and prior identified history of sexual victimization of predation will be utilized to help determine if the inmate is at risk of future victimization of sexual abuse, sexual battery, or is at risk of committing sexual abuse or sexual battery. Information from the PREA risk screening is calculated for the determination for informing 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. Housing for transgender and /or intersex inmates will be determined on a case-by-case basis on whether to assign a transgender to a male or female facility, housing and programming assignment are based on inmates' health and safety, their own views with respect to their safety and whether the placement would present management and security concerns. The facility reported there were zero inmates identified as transgender and/or intersex at the facility during management of MTC.</p> <p data-bbox="240 1518 1481 1680">Per the MTC PREA Coordinator, the agency does not place lesbian, gay, bi-sexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status. Additionally, the agency does not have a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmate. Inmates' assignments are based on their screening only with consideration of them determined to be at risk of sexual abuse. An individual determination is made for each inmate that includes input from the inmate on the best housing for them.</p> <p data-bbox="240 1711 1485 2136">Interviews conducted with staff who conduct risk screenings, and the MTC/GRFC PREA Compliance Manager indicated there has not been any inmates identified as transgender and/or intersex at GRFC since the management of MTC. However, inmates identified as such would be reassessed bi-annually and allowed to provide input of their concerns to their own safety and programming. Staff also identified the facility does not have a concrete decree and or special wing to house transgenders. Staff who conduct risk screening inmates stated the facility has several housing units with various programs, and although the transgender/intersex inmate would be placed in a dedicated housing unit, they would be assigned to a housing unit where they felt secure. There were no inmates identified as transgender and /or intersex to interview regarding their housing assignment and/or their ability to shower separate from other inmates. However, the facility identified 97 inmates who self-reported being gay, and bi-sexual housed at the facility. Interviews were conducted with four (4) inmates who self-reported being gay and one (1) inmate who self-reported as bi-sexual. All inmates acknowledged they were issued shower passes by medical staff that allows them to shower separately from other inmates and acknowledged that they were assigned to various housing units throughout the facility, while feeling safe at the facility and in their assigned housing unit. All reported their showers are taken during the evening count when other inmates are assigned to their cell. Interviews with</p>

all staff confirmed their awareness that inmates identified as transgender, intersex, gay, bi-sexual are allowed to shower at separate times from other inmates.

Based on the review of agency policies, interviews with staff who conduct risk assessments, MTC/GRFC PREA Compliance Manager, MTC PREA Coordinator, inmates identified as gay and bi-sexual, random staff, gay and bi-sexual inmates housing assignments, observation during the site visit, GRFC/MTC does meet all provisions of the standard.

115.43	<p>Protective Custody</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. PREA Case Files 4. Interviews: <ol style="list-style-type: none"> a. Warden b. Staff who Supervise Segregation <p>115.43 (a) (b) (c) (d) (e) MTC #903E.02 prohibits the placing of 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. If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population. Per interviews with the Warden, GRFC PREA Compliance Manager and staff assigned to supervise segregation, the facility does not assign inmates at high risk of sexual victimization in involuntary segregation. Based on the various housing units throughout the facility, alternate housing arrangements are available without the assignment of segregation.</p> <p>Per an interview with staff assigned to supervise segregation, all inmates placed in segregation are given the opportunities for recreations, phone calls, education, haircuts, legal and leisure reading material, and personal property, etc. However, due to security measures within segregation, work opportunities are limited. A review of the investigative case files did not identify any inmates as being at risk of sexual victimization placement in involuntary segregation. There were zero inmates identified as at a high risk of sexual during the 8-month review period and/or during the site visit for interview.</p> <p>Based on the review of policy, investigative case files, and interviews with Warden, staff assigned to supervise segregation, GRFC does meet all provisions of the standard.</p>
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115.51	Inmate reporting
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1134 813" style="list-style-type: none"> 1. Management & Training Corporation (MTC) Completed Pre-Audit Questionnaire (PAQ) 2. MTC #903E.02 Sexual Safety in Prisons 3. Inmate Facility Handbook 4. PREA Posters 5. Completion of Call to Outside Entity 6. Completed Call to the PREA Hotline 7. Interviews: <ol style="list-style-type: none"> a. Random Staff b. Random and Target Inmates <p data-bbox="242 842 1493 1339">115.51 (a) (b) (c) (d) MTC has established procedures allowing for multiple ways internal ways for inmates to report privately to MTC officials about sexual abuse or sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. The inmate handbook, PREA posters and flyers throughout the facility advise the inmate population of various ways to report PREA allegations both internally and to a public or private entity or office that is not part of the agency. Available resources are accessible to the inmate population via dialing one of the following: *8466 TIPS; MTC PREA Hotline *8488; and/or the public entity of the Gulf Coast Children Advocacy Center at *8466. Inmates are directed to follow the prompts upon making the call. The auditor conducted a test call while in an inmate's housing unit that confirmed the availability of the reporting services. The call to the outside the entity can receive and immediately forward inmate reports of sexual abuse and sexual harassment to MTC staff upon authorization of the caller. Interviews with random and targeted group inmates confirmed their knowledge of the various resources to report PREA allegations. The inmates acknowledged the various numbers are posted on all inmate phones and on posters throughout the facility. An inmate identified as deaf stated he could use the TTY equipment and communicate with the operator who would type the translation via video in addition to reporting to a staff member. Inmates identified as blind and/or low vision stated they could utilize the Kiosk system to communicate with others outside the facility and or report to a staff member.</p> <p data-bbox="242 1368 1493 1597">Staff interviews confirmed their knowledge of policy that mandates they must accept reports of sexual assault and sexual harassment made verbally, in writing, anonymously, and from third parties with no exceptions to a staff member not less ranking than their first supervisor. Each stated they would document the information they received and the method in which it was received to include verbally, written notes by an inmate, received via a third party and/or anonymously. Staff identified they were comfortable reporting PREA allegations directly to their supervisor and/or an official investigator. They were also aware of the outside resource number at 1-866-246-4412 which is posted throughout the facility for the public to report sexual abuse and/or sexual harassment that is also available for their usage.</p> <p data-bbox="242 1626 975 1655">The agency does not detain inmates solely for civil immigration purposes.</p> <p data-bbox="242 1684 1493 1778">The review of the completed 10 PREA investigative case files, confirmed the inmate population utilized various reporting methods that included verbally reporting directly to staff, utilization of the PREA Hotline, submitting written notes to staff, and utilization of the grievance process.</p> <p data-bbox="242 1807 1493 1870">Based on the review of agency policies, investigative case files identifying the method of reporting, interviews with staff and the inmate population, it is determined that GRFC does meet all provisions of the standard.</p>

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. GRFC Inmate Handbook 4. PREA Investigations/Grievances <p>115.52 (a) (b) (c) (d) (e) (f) (g) MTC has an administrative procedure for dealing with inmate's grievance s regarding sexual abuse. MTC #903E.02, FDC602.053, and GRFC Inmate Handbook outlines the agencies and facilities procedures for filing sexual abuse allegations through the grievance process. MTC allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. No initial time limit shall be imposed for sexual abuse, sexual battery, staff sexual misconduct or sexual harassment grievances. An attempt to informally resolve the grievance is prohibited and the allegation of sexual abuse will not be referred to the any staff member identified as the subject of the complaint. Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates are allowed to assist inmates in filing such grievances. The filing of emergency grievances for allegation of sexual abuse. Allegations alleging substantial risk of imminent sexual abuse require that a final agency decision within five days. Policy limits the agency's ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the facility demonstrates that the inmate filed the grievance in bad faith.</p> <p>The PAQ identified three (3) allegations of sexual abuse was reported through the grievance process. However, a review of the investigative case files, identified there were zero allegations of sexual abuse reported through the grievance process. However, three allegations of sexual harassment were reported through the grievance process and were referred for investigation upon receipt.</p> <p>Based on the review of agency policies, grievances referred for investigations and review of the grievance process, GRFC does meet all provisions of the standard.</p>

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 208 451 235">Auditor Discussion</p> <p data-bbox="240 271 813 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 327 1233 927" style="list-style-type: none"> 1. Management & Training Corporation (MTC) Completed Pre-Audit Questionnaire (PAQ) 2. MTC #903E.02 Sexual Safety in Prisons 3. Memorandum of Understanding Between MTC and Gulf Coast Children’s Advocacy Center, INC 4. GRFC Inmate Handbook 5. Observation during site visit 6. Inmate Telephones 7. PREA Posters 8. Interviews: <ol style="list-style-type: none"> a. Inmates who reported sexual abuse b. OIG Investigator c. Random and Target Group Inmates <p data-bbox="240 958 1473 1151">115.53 (a) (b) (c) MTC#903E.02 outlines the facility’s obligation to provide inmates with access to outside victim advocates for emotional support services related to sexual abuse. In addition to giving inmates mailing addresses and telephone numbers including toll-free hotline numbers where available. Each MTC facility informs inmates, prior to giving them access to outside support services, the extent to which such communication will be monitored, and inform inmate of the mandatory reporting rules governing privacy, confidentiality and /or privilege that apply for disclosure of sexual abuse made to outside victim advocate, including limits of confidentiality.</p> <p data-bbox="240 1182 1485 1442">The GRFC Inmate Handbook page 42 includes the statement “If you become a victim of sexual abuse or sexual battery will have the right to speak with a victim advocate. You may call Gulf Coast Children’s Advocacy Center by dialing *8466. There is no charge for this call. If you believe you need to speak with a confidential source regarding sexual victimization you can dial *8466 on the inmate telephone and anonymously speak to a victim advocate at Gulf Coast Children’s Advocacy Center.” This number and the confidentiality of it was observed posted on all inmate telephones in each housing unit accessible to the inmate population. PREA posters were also posted throughout the facility accessible to the inmate population with the confidential unmonitored outside source information. The auditor tested the inmates’ phones for confirmation of the services identified.</p> <p data-bbox="240 1473 1492 2002">MTC and the Gulf Coast Children’s Advocacy Center, Inc. entered a contract effective April 21, 2022, and may be renewed annually. The Gulf Coast Children’s Advocacy Center, Inc., is the administrator of the Gulf Coast Sexual Assault Program (a certified rape crisis center). The contractor agrees to provide advocacy services to inmates at GRFC in a manner that aligns with the PREA standards established by the U.S. Department of Justice. The contractor’s responsibilities include: 1) Provide a 24/7 toll-free rape crisis hotline, staffed by certified victim advocates; 2) Provide a mailing address for inmates victims to send correspondence, and provide a response to correspondence within seven (7) business days; 3) Provide a certified victim advocate to respond to request for advocacy accompaniment during sexual assault forensic exams and investigatory interviews within two (2) hours of notification by MTC; 4) Provide follow-services and crisis intervention to the inmate victims of sexual assault as resources allow; 5) Provide MTC with the name of the advocate responding to a forensic exam, investigatory interview, or individual counseling/advocacy/follow-up session, within one (1) hour of notification by MTC; 6) Maintain privileged communication with clients as required by state and federal law and the Contractor’s policies; 7) Terminate the hotline call or individual service session(s) if an inmate’s need for services is not, or is no longer, primarily motivated by a desire to heal from sexual violence; 8) Provide inmates with referrals for treatment after release, upon transfer to another facility; 9) Provide inmates with information about how to report sexual abuse, including the correctional institutions’ responsibility to investigate each report, and to protect inmates and staff who report from retaliation; 10) Communicate any questions or concerns to the correctional institution staff.</p> <p data-bbox="240 2033 1477 2161">Interviews were conducted with 30 randomly selected inmates and 22 targeted group inmates that include three (3) inmates who reported sexual abuse. All inmates were knowledgeable of the various methods and phone numbers posted on the inmate phones to include *8466 for advocacy services. However, none identified utilization of the services, none had any additional information regarding the services offered. The three (3) inmates who reported sexual abuse confirmed they were</p>

offered a victim advocate upon reporting the allegation, but each declined the services.

Interviews with medical staff and the OIG Investigator confirmed upon an inmate's arrival to the medical department after reporting an allegation of sexual abuse, the inmate is immediately given the opportunity to have a victim advocate report to the facility. If the inmate chooses to have a victim advocate, the investigator is required to cease all communication with the victim and await the arrival of the victim advocate prior to interviewing the inmate. If the inmate refuses the services of a victim advocate, he is required to document his refusal.

Based on the review of the MOU, interviews with the medical staff, OIG Investigator, interviews with random, target and inmates who reported sexual abuse, PREA posters, phone number postings on inmate phone, observation during site visit, testing of advocacy services, GRFC does meet all provisions of the standard.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="229 300 1509 591" style="list-style-type: none"> <li data-bbox="229 300 1509 344">1. GRFC Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="229 344 1509 389">2. MTC #903E.02, Sexual Safety in Prison (PREA) <li data-bbox="229 389 1509 434">3. MTC Website <li data-bbox="229 434 1509 479">4. GRFC Inmate Handbook <li data-bbox="229 479 1509 524">5. Florida Department of Correction Website <p data-bbox="229 591 1509 815">115.54 (a) In accordance with MTC#903E.02, MTC provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. MTC facilities are to publicly distribute information on how to report inmate sexual abuse or sexual harassment on behalf of inmates. A review of the MTC website at www.mtctrains.com/prea, states: those interested in reporting an allegation of inmate-on-inmate or staff-on-inmate sexual abuse and/or sexual harassment, may contact the MTC PREA Coordinator Heather, Manuz@mtctrains.com or the Assistant PREA Coordinator, Mike Atchison @ ctctrainins.com. Third-party reporting is also included in the GFC Inmate Handbook that states the public may call 1-866-246-4412.</p> <p data-bbox="229 815 1509 972">Third party reporting through the inmate's process is also identified on the Florida Department of Corrections website www.dc.state.fl.us/prea/index that is available to the public. It states: As a Third party, you are only allowed to file a grievance on behalf of an inmate that relates to sexual abuse. Although this method speaks of filing a grievance on behalf of an inmate, it is also a method of third-party reporting.</p> <p data-bbox="229 972 1509 1106">Based on the review of MTC website, FDC website and GRFC Inmate Handbook, the opportunity to report as a third-party has been identified and is accessible for viewing by the inmate population and through the public's viewing on the MTC and FDC websites. Therefore, GRFC does meet the provisions of the standard.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Interviews: <ol style="list-style-type: none"> a. Warden b. MTC PREA Coordinator c. Random Staff d. Medical and Mental Health Staff <p>115.61(a) (b) (c) (d) (e) FDC #062.053 and MTC #903E.02 policies identifies procedures and requirement for all staff to include volunteers, contractors and intern who observes, has knowledge of, or received information, written or verbal (either first hand or from a third party), regarding the fear of, coercion into or actual sexual abuse, sexual battery, staff sexual misconduct, or sexual harassment, any retaliation against inmates or staff who reported an incident of sexual abuse or harassment, any neglect or violation of responsibilities that may have contributed to an incident of retaliation, will immediately notify the Shift Supervisor, the Chief of Security, the Warden, or the OIG. Apart from reporting to the designated supervisors or official and designated state or local services agencies. MTC 's policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigate, and other security and management decisions. Interviews with 21 random staff that include security and non-security confirmed their knowledge of responsibility to report all information reported to them and/or they became aware of to their immediate supervisor and the security shift supervisor. Staff indicated they would only share information of reported PREA allegations to staff with a need to know, such as security supervisors, medical, mental health, and investigative staff. The information received would be documented in written format. Per medical and mental health staff interviews, inmates are advised of staff's duty to report at the initiation of services. Information of PREA allegations would be reported to the security supervisor, GRFC Investigator/ OIG Investigators, and the Associate Warden over their department. Per interviews with the Warden and agency PREA Coordinator, MTC facilities, does not normally contract with facilities that house offenders under the age of 18 years and none at designated GRFC. However, sexual abuse committed on a youthful offender under the age of 18 years old would immediately be reported to state and local law enforcement agencies, the FDC Office of Inspector General, and Children and Family Services. All reported allegation of sexual abuse and/or sexual harassment to include those reported verbally, in writing, anonymously and via third party would be referred for an investigation by appropriate investigating staff, GRFC investigator and/or the OIG Investigator.</p> <p>Based on the review of agency policies, interviews with random security and non-security staff, Warden, MTC PREA Coordinator, medical and mental health staff, GRFC does meet all provisions of the standard.</p>

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Interviews: <ol style="list-style-type: none"> a. Warden b. Agency Head c. Random Staff <p>115.62 (a) In accordance with MTC 903E.02, when MTC requires immediate action to protect the inmate to including taking some action to assess appropriate protective measure without unreasonable delay upon learning that an inmate is subject to a substantial risk of imminent sexual abuse. Per an interview with the Agency Head, the agency requires immediate action to protect the inmate. Efforts of protection includes at least temporarily, separate the inmate who is reportedly subject to a substantial risk of imminent sexual abuse from the general population, notifying supervisory staff in a confidential manner, document observations and information, and investigate the nature and scope of risk to the offender, and taking action consistent with the facts derived and customer agency policy. The Warden confirmed any inmate identified as subject to substantial risk of imminent sexual abuse would immediately be assigned to another housing unit within the general population, and only as a last result would the inmate be placed in segregation.</p> <p>The GRFC PAQ identified 20 instances where an inmate was identified as subject to a substantial risk of imminent sexual abuse. This number was based on the number of reported PREA allegations that included sexual abuse and sexual harassment, and not inmates who were identified as at risk of imminent sexual abuse prior to reporting the allegations that was forward for investigation. A review of the ten completed investigative case files, did not identify any inmate as subject to substantial risk of imminent sexual abuse prior to reporting the allegation and the initiation of the investigation. Therefore, the correct number of inmates identified as subject to a substantial risk of imminent sexual abuse was zero. Interviews with 21 random staff confirmed upon being advised of an inmate being subject to a substantial risk of sexual abuse, the inmate would immediately be removed from the area of threat, a visual observation would be maintained, and the security supervisor would be notified.</p> <p>Based on the review of agency policy, interviews with 21 random staff, warden and agency head and review of PREA investigative case files, GRFC does meet all provisions of the standard.</p>

115.63	<p>Reporting to other confinement facilities</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Interviews: <ol style="list-style-type: none"> a. Warden b. Agency Head <p>115.63 (a) (b) (c) (d) MTC 903E.02 states upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency /facility where sexual abuse is alleged to have occurred. Within 72 hours, MTC requires that the facility head provide such notification as soon as possible after receiving allegation and provide documents. MTC's policy requires that allegations received from other facilities are investigated. An interview with the Agency Head, identified the facility head/warden is the designated point of contact upon the reporting of inmates reporting PREA allegations having occurred at a previous institution at their newly assigned facility. The facility in which the allegation was reported to have occurred will ensure an investigation is completed. The Warden confirmed notification was made to the affected institution Warden within 24 hours of the inmate reporting the PREA allegation occurring at his previous institution. He also has received one notification of a PREA allegation having occurred at GRFC after the inmate's departure and arrival at his newly assigned facility. The reported PREA allegation was referred for investigation.</p> <p>An email notification was forwarded from the GRFC's Warden to the arrival inmate's previous institution of a sexual abuse allegation having occurred while assigned there. The inmate was identified as arriving at GRFC on April 5, 2022. The Warden-to-Warden notification was documented as forward on April 6, 2022.</p> <p>Based on the review of agency policy, email notification and referral for investigation, and interviews with the Warden and Agency Head, GRFC does meet all provisions of the standard.</p>
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115.64	Staff first responder duties
	<p data-bbox="240 143 740 172">Auditor Overall Determination: Meets Standard</p> <p data-bbox="240 208 451 235">Auditor Discussion</p> <p data-bbox="240 271 813 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 327 1294 757" style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Interviews: <ol style="list-style-type: none"> a. Security First Responder b. Non-Security First Responder c. Inmates who reported sexual abuse d. Random Security and Non-Security Staff <p data-bbox="240 786 1476 1081">115.64 (a) (b) FDC #602.053 and MTC #903E.02 both outline procedures to respond to an allegation of sexual abuse for security and non-security staff. The policies require that, 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: a) Separate the alleged victim and abuser; b) preserve and protect any potential crime scene until appropriate steps can be take to collect any evidence, the , and protect crime scene until appropriate steps to collect evidence; c) if the alleged abuse occurred within a time period that still allows for the collection for physical evidence, request the alleged victim and alleged aggressor not take any actions that could destroy physical evidence, including but not limited to, washing, bathing, brushing teeth, changing clothes, urinating, defecating, drinking or eating; d) if the first responder is not a security staff member, request that the alleged victim not take any action that could destroy physical evidence, and the notify security staff.</p> <p data-bbox="240 1111 1485 1440">The facility reported 15 allegations of sexual abuse two (2) staff on inmate and 13 inmate-on-inmate. Five (5) inmate-on-inmate sexual abuse investigations were completed. The facility identified three (3) reported allegations of sexual abuse where staff served as a first responder within a period for first responder duties that included the preservation and collection of physical evidence. Interviews were conducted with both security and non-security staff who served as a first responder. The non-security first responding staff reported the inmates were already separated when the victim reported the allegation. The victim remained with staff and the security supervisor was notified. The security first responder indicted upon being advised of the sexual abuse allegation by the victim, he placed the victim in a dry cell to preserve physical evidence while contacting the shift supervisor. He added, he did not enter the identified area so as not to disturb any physical evidence. The review of the five completed sexual abuse investigative case files, confirmed physical evidence was collected by medical and/or the SART (SANE), and the OIG Investigator who arrived at the facility.</p> <p data-bbox="240 1469 1490 1599">Interviews with security and non-security staff confirmed their awareness of agency policy while serving as a first responder. Additionally, all staff (security and non-security) were observed wearing a PREA refresher card attached to their official name badge that included the duties of a first responder. Interviews conducted with three (3) inmates who reported sexual abuse, confirmed they were immediately escorted to the medical department while physical evidence was collected by medical staff.</p> <p data-bbox="240 1628 1466 1722">Based the review of agency policies, interviews with security first responder, non-security first responder, random staff and their knowledge of first responder duties, and interviews with inmates who reported sexual abuse, GRFC does meet all provisions of the standard.</p>

115.65	Coordinated response
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1088 412" style="list-style-type: none"> <li data-bbox="242 327 1088 356">1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="242 383 638 412">2. GRFC PREA Coordinated Response <p data-bbox="242 441 1489 501">115.64 (a) The GRFC Coordinated Response outlines the facility’s written plan to coordinate actions taking in response to an incident of sexual abuse.</p> <p data-bbox="242 533 1493 692">Specifically, any employee who has knowledge or received information, written or verbal (via firsthand or from a third party), regarding the fear of, coercion into, or actual sexual abuse, sexual battery, staff sexual misconduct, or sexual harassment will immediately notify the Shift Supervisor or the Chief of Security who will then take immediate steps to evaluate the inmate’s concern/allegation. The authority notified will ensure proper medical treatment (if applicable) and the safety of the inmate by means provided in “Administrative Confinement” if applicable.</p> <p data-bbox="242 723 1489 918">First responder duties are outlined for security staff and non-security staff that include the separation of victim and aggressor, medical treatment, the collection, protection and preservation of any evidence to include physical evidence, notifying the security supervisor, and ensuring the alleged victim is given a copy of the NII-20 form while advising the inmate of his right to access crisis intervention services, to have a forensic examination and to have a victim advocate present during the forensic examination and/or investigative interview if the inmates chooses. The offer of the victim advocate services will be documented in an incident report.</p> <p data-bbox="242 949 1404 1010">It is the responsibility of the Shift Supervisor or the Chief of Security to ensure the victim and identified aggressor are escorted to medical.</p> <p data-bbox="242 1041 1465 1102">If the incident was reported to have occurred within 48 hours, the Office of Inspector General will be notified to determine if physical evidence exist for examination before activating the Sexual Abuse Response Team (SART).</p> <p data-bbox="242 1133 1465 1193">The Shift Supervisor or the Chief of Supervisor shall ensure all names of responding staff are recorded and provided to the responding Inspector. All inmate witnesses shall be segregated, and their information will be listed on an incident report.</p> <p data-bbox="242 1225 1473 1350">The Shift Supervisor or the Chief of Security shall ensure: 1) Any weapon or evidence suspected of being involved in a sexual battery or sexual misconduct is preserved. 2) A “Chain of Custody “is created and maintained. 3) All evidence is provided to the responding Inspector or other law enforcement personnel as soon as possible and with minimal handling so as to preserve any latent or forensic evidence contained thereon.</p> <p data-bbox="242 1382 1477 1442">The Shift Supervisor will ensure that a dc6-210, and a Management Information Notes System (MINS) report are processed and submitted.</p> <p data-bbox="242 1473 1485 1534">The Inspector shall respond to the scene and conduct any necessary preliminary interview of victims, witnesses as others as applicable appropriate.</p> <p data-bbox="242 1565 1485 1657">The SART team will be activated. Supervisory staff and the Inspector will ensure that no attempt is made by medical staff to clean or treat the inmate unless the injuries are such that not treating them would cause deterioration of the inmates’ medical condition.</p> <p data-bbox="242 1688 1461 1749">Following the forensic medical examination (or after the inmate is escorted to medical for those instances where the SART team is not activated), medical staff shall ensure the “Alleged Sexual Battery Protocol” DCA4-683M is completed.</p> <p data-bbox="242 1780 1465 1841">Medical staff shall complete the “Consent and Authorization for Use and Disclosure Inspection and Release of Confidential Information” and have the inmates sign the form.</p> <p data-bbox="242 1872 1485 1933">The victim and perpetrator (if known) will be provided access to a sexual transmitted infection prophylaxis in accordance with professional accepted standards of care. The victim and aggressor will be referred for mental health services if appropriate.</p> <p data-bbox="242 1964 1485 2024">Based on the review of the facility’s PREA Coordinated Response that outlines all services for the victim and aggressor upon a reported allegation of sexual abuse, it is determined that GRFC does meet the provision of the standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons (PREA) <p>Interview:</p> <ol style="list-style-type: none"> a. Agency Head <p>115.66 (a) MTC #903E.02, mandates that any collective bargain agreement or other agreement must comply with PREA Standards dated August 20, 2012. Per an interview with the Agency Head, MTC has an existing collective bargaining agreement (CBA) with the Federal Contract Guards of American International Union (FCGOA) at Willacy Regional Detention Facility. The original term of the CBA was December 13, 2012 – December 12, 2015. The contract has been sub sequential extended, the parties executed he current CBA which is effective September 1, 2019 through August 31, 2022. MTC can verify that the CBA permits the agency, via MTC, to remove alleged staff sexual abusers from contact with any inmate pending an investigation or a determination of whether and to what extent discipline is warranted. There were and are no provision in the CBA which limits the Management’s Rights clause specifically to management’s right to removal of an employee from contact with inmates. A staff member identified in an allegation of staff on inmate sexual abuse had previously been placed on no inmate contact during the site visit pending the completion of the investigation.</p> <p>Based on the review of agency’s policy, interview with the agency head and the assignment of no inmate contact of a staff member during the site visit, the facility does meet all provision of the standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed PREA-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. Florida Department of Corrections (FDC) #602.053 Prison Rape: Prevention, Detection, and Response 4. Interviews: <ol style="list-style-type: none"> a. Agency Head b. Warden c. Staff Assigned to Conduct Retaliation Monitoring d. Inmates Who Reported Sexual Abuse <p>115.67 (a) (b) (c) (d) (e) FDC #602.053 and MTC #903E.02 outlines the mandates of this standard. A designated staff member is required to conduct retaliation monitoring on all staff and inmates who report allegations of sexual abuse, sexual harassment, and/or those who cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates and/or staff. A review of PREA investigative case files include retaliation monitoring for inmates who reported sexual abuse allegation with an investigative finding of Unsubstantiated. There were zero investigative findings of substantiated sexual abuse and or sexual harassment. The Classification Supervisor and a Classification Officers were assigned to conducting retaliation monitoring for both staff and the inmate population. There were no instances where a staff member met the standard provisions for retaliation monitoring. Retaliation monitoring is maintained in an automated system developed by the FDC as a case management entry. Regardless of an inmate's transfer to another Florida Department of Corrections facility and/or MTC, the required retaliation monitoring is identified as an assignment for monitoring. Entries were identified in which of the 10 completed PREA investigative case files that confirmed each inmate was monitored at 30-day intervals for 90 days after reporting sexual abuse and sexual harassment. There were zero instances in where an extended period of monitoring was required. Each entry documented conversations with each the inmate for retaliation monitoring, during face-to-face interaction, that include the inmate's input of safety from retaliation, any changes in housing assignment, programming, disciplinary actions, custody level changes, and negative gain-time.</p> <p>Per the agency head, MTC policy prohibits retaliation against those that allege sexual abuse or sexual harassment for both staff and the inmate population. Staff violation of policy is subject to MTC's progressive disciplinary process. Inmate retaliation is subject to inmate disciplinary process. Placement in protective custody or restrictive housing pending investigation or pending transfer is used to protect the inmate after all other alternative for protection have been considered. If an individual who operates with an investigation express a fear of retaliation, an initiation of targeted monitoring techniques will begin on both the informant and those inmates perceived as a threat. Monitoring is completed via video, phone calls, mail, observation of commissary spending and direct observation.</p> <p>Per the Warden, a variety of measures is utilized to protect both staff and the inmate population from retaliation. Staff on staff measures could include separation, issuing of cease-and-desist orders, assignment to different shifts, disciplinary actions for violation of employee code of conduct. Inmates could be result in housing, program and/or job changes, disciplinary sanctions as applicable to the inmate initiating retaliation, and possible transfer as applicable.</p> <p>Interviews were conducted with three (3) inmates who reported sexual abuse, each confirmed they were contacted by staff throughout the following months of reporting the allegation in regard to any negative interaction and/or concerns with their safety upon reporting the allegation. Each indicated they felt protected from possible revenge from staff and inmates after reporting the sexual abuse and did not encounter any negative actions from others. There were zero inmates in segregation for risk of imminent sexual abuse and/or who reported sexual abuse during the site visit.</p> <p>Based on the review of agency polices, completed 30-, 60- and 90-days retaliation monitoring for inmates reported sexual abuse allegations and sexual harassments, interviews with agency head, warden, staff assigned to conduct retaliation monitoring, and inmates who reported sexual abuse, GRFC does meet all provisions of the standard.</p>

115.68	<p>Post-allegation protective custody</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons (PREA) 3. Interviews: <ol style="list-style-type: none"> a Warden b. Staff who supervise segregation c. Inmates who reported sexual abuse <p>115.68 MTC 903E.02 outlines agency policy for post-allegation protective custody. MTC prohibits the placing of inmates at high risk of sexual victimization in involuntary segregated housing unless an assessment of all available alternative has been made and a determination has been made that there is no available alternative means of separation from likely abusers. If an involuntary segregation housing assignment is made, a review will be conducted every 30 days to determine whether a continuous stay is needed. An interview with the Warden, MTC policy prohibits the placement of inmates in involuntary segregation who report an allegation of sexual abuse. However, if an inmate cannot and/or refuse to identify the aggressor, the inmate would only be placed in involuntary segregation until alternate housing could be arranged. Per the supervisor of segregation, any inmate placed in involuntary segregation would be reviewed every 30 days and would have access to education material delivered by education staff, canteen, property, telephone and mail privileges, recreation, haircuts, etc. Due to the security measures required for segregation, work opportunities are restricted. The facility identified there were zero inmates placed in involuntary segregation during the eight (8) review period. Interviews with three (3) inmates who reported sexual abuse also denied they were placed in involuntary segregation upon reporting sexual abuse. However, each reported they were offered an opportunity for placement in administrative segregation if they felt a threat to their safety.</p> <p>Based on the review of agency policy, interviews with Warden, supervisor of segregation, completed investigative case files of inmates who reported sexual abuse and interviews with inmates who reported sexual abuse, GRFC does meet the standard provision.</p>
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115.71 Criminal and administrative agency investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

- 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
- 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons (PREA)
- 3. Florida Statue 944.31
- 4. Florida Department of Corrections, (FDC) #108.015 Florida Department of Corrections #108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations
- 5. Interviews:
 - a. GRFC Warden
 - b. MTC Investigator
 - c. Office of Inspector General Investigator
 - d. Inmates Who Reported Sexual Abuse

115.71 (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) MTC 903E.02, Florida Statue 944.31 and FDC 108.015, outlines all provisions within this standard. MTC facility investigators are authorized to conduct administrative investigations only. Per FDC #108.015, If there is no criminal predicate, the investigation shall be investigated as an administrative case. When the quality of evidence appears to support criminal prosecution investigation will be conducted by the Office of Inspector General (OIG).

Florida Statue 944.31 outlines the requirements and responsibility for conducting investigations within the Florida Department of Corrections. The inspector general and inspectors shall be responsible for criminal and administrative investigation of matters relating to the Department of Corrections. The secretary may designate persons within the office of the inspector general as law enforcement officers to conduct any criminal investigation that occurs on property owned or leased by the department or involves matters over which the department has jurisdiction.

Interviews were conducted with the facility MTC Investigator and an Office of Inspector General Investigator. Both acknowledged that administrative investigations can be conducted by the institution investigator while all investigations that could possibly include criminal charges are investigated an Investigator assigned to the Office of the Inspector General. Per the MTC Facility Investigator, she refers all allegations of sexual abuse and sexual harassment to the OIG, and the investigator is assigned by office of the OIG. Approval for the facility investigator to conduct the administrative investigation is normally given the following day from the OIG. Per the OIG Inspector an investigation is initiated within 24 hours being assigned by the OIG Supervisor. However, if the inmate reported an allegation of sexual abuse within the 72-hour timeframe, the investigation would be initiated immediately upon being advised. The OIG Inspector would report to the facility immediately. Both investigators confirmed allegations reported anonymously and/or third-party are conducted in the same manner as those reported directly by staff and/or inmate.

Pursuant to the Florida Statue 944.31, The OIG Inspectors assigned to conduct both administrative and criminal investigative and is a person designated as a law enforcement officer. The law enforcement office must be certified pursuant to s. 943.1395 and must have a minimum of 3 years' experience as an inspector in the inspector general's office or as a law enforcement officer. The OIG Investigator confirmed she has completed and completely annually the advanced specialized PREA training in addition to training that far exceeds the requirement of the PREA standards as the investigators assigned to the department are sworn law enforcement officers with arresting authority. The investigative training required and completed the OIG Inspectors far exceed that required by the standard provision of 115.34. The GRFC Facility Investigator conducts administrative investigations only and completed the specialized training as identified in standard 115.34.

Interviews with the OIG Investigator confirmed the collection and preservation of all direct and circumstantial evidence that includes all physical and DNA evidence, clothing, objects that may be identified as a means of penetration, securing the crime scene, conducting interviews with the victim, aggressor and any they may identify as witnessing the incident, interviews others that may have been within the identified area, and offering both the victim and aggressor the opportunity to submit to a forensic examination. The aggressor would be made aware of his Miranda rights prior to questioning. Both the victim and aggressor would be offered a forensic medical examination and have the option to refuse or accept. As a sworn law enforcement officer with arresting authority, if sufficient evidence supports a crime has been committed, she continues questioning the aggressor prior to communicating with the State Attorney's Office.

The investigative findings are based on the evidence collected only, not on the credibility of an alleged victim, aggressor, or witness. A case is referred for prosecution when an establishment that a probable cause of a crime has been committed.

Interviews were conducted with three (3) inmates who reported allegations of sexual abuse. Each confirmed they were not asked to submit to any type of truth telling device during the investigation. Per interviews with both investigators, determination of the investigative findings is based on an individual basis and the preponderance of evidence collected, not the status of an individual identified as victim, aggressor, staff or witness.

During the course of the investigation, actions of staff when the incident was alleged to have occurred would be reviewed to include via video monitoring. A determination of staff not in performance of their duties, such as vacating their assigned post assignment, failing to conduct required rounds, disregarded to an inmate's report of an allegation and other actions that could have contributed to the occurrence of sexual abuse would be investigated and a written report would be submitted identifying their actions.

Per the OIG Inspector General Investigator, all investigations would continue regardless of a staff member termination, resignation, inmate's release and/or transfer to another correctional facility. An interview would be scheduled for a face-to-face interview with all identified as involvement to include possible witnesses. Statements would be video recorded and if necessary, a warrant would be issued to a DNA sampling as applicable. All investigations are conducted pursuant to the standard provisions.

Per the investigators, all reviewed documentation, video, collected telephone calls, statement of witnesses, the victim, aggressor, medical and mental health documentation, description of the crime scene, photographs of victims, aggressors and all physical evidence to include the results of DNA sampling would be included in the written report.

MTC was awarded the contract to manage the GRFC on September 1, 2021. Since the effective date, the facility has reported 20 PREA allegations. Ten were identified as closed and 10 remained pending the completion of the investigation throughout the audit process. The allegations were reported as the following: four (4) inmate-on-inmate sexual harassment; one staff-on -inmate sexual harassment; and 15 inmates on inmate sexual abuse/assault. The four (4) inmate-inmate sexual harassment cases were concluded with an investigative finding of unsubstantiated. One staff on inmate sexual harassment allegation was determined as unfounded. Five (5) inmate-on-inmate sexual abuse investigations were concluded as unsubstantiated. The auditor reviewed all ten completed investigative reports. Each case file contained, and thoroughly documented statements submitted by the alleged victim, aggressor, witnesses as applicable, medical, and mental health evaluations, physical evidence, investigative findings, and basis for the determined investigative finding.

The Warden GRFC PREA Coordinator identified the OIG Inspector General's Office through the Florida Department of Corrections as the outside entity for conducting investigations for MTC/GRFC for selected administrative and all criminal investigations. An open line of communication is maintained between the agencies of reported PREA allegation findings. The facility investigator provides assistance to the OIG Inspector General Office as requested and work together in the completion of the investigations.

Based on the review of policies, Florida Statue, investigative case files final reports, interviews with OIG Inspector General's Investigator, GRFC Investigator, Warden, GRFC PREA Compliance Manager, and inmates who reported allegations of sexual abuse, it is determined GRFC does meet all provisions of the standard.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons (PREA) 3. Interviews: <ol style="list-style-type: none"> a. OIG Inspector b. MTC/GRFC Facility Investigator <p>Policy imposes a standard of a preponderance of evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. Interviews with the OIG Inspector and the MTC/ GRFC Investigator, confirmed the investigative finding does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. The OIG Inspector confirmed upon the determination of a probable cause that a crime has been committed, the case is referred for prosecution. Based on the review of policy, interviews with the GRFC Investigator and OIG Inspector, GRFC does meet the provision of the standard.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. Florida Department of Corrections, (FDC) #108.015 Florida Department of Corrections #108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations
4. Confirmation of Inmate Notification of Investigative Findings
5. Completed PREA Investigative Casefiles
6. Interview:
 - a. GRFC Warden
 - b. Office of Inspector General Investigator
 - c. GRFC Facility Investigator
 - d. Inmates who reported sexual abuse

115.73 (a) (b) (c) (d) (e) (f) MTC 90E.02 and FDC #108.015 policies require that any inmate who alleges that he or she suffered sexual abuse in an MTC facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfound following an investigation by MTC. If an outside entity conducts such an investigation, MTC requests the relevant information from the investigative entity in order to inform the inmate as to the outcome of the investigation. All notifications to inmates described under this standard are required to be documented. Per a review of FDC #108.05, and interviews with the OIG Inspector and GRFC Facility Investigator, victims of any sexual battery shall be permitted to review the final investigative report and submit a statement as to the accuracy of the report. However confidential information pertaining to the alleged aggressor will be redacted from viewing by the alleged victim.

The case inspector shall notify any PREA victim inmate if an allegation against a staff member for sexual abuse, sexual battery, sexual misconduct, sexual harassment, or voyeurism (administrative or criminal) is exonerated, sustained, partially sustained, not sustained, unfounded, closed by arrest, exceptionally cleared, or placed in open-inactive status. Any victim inmate shall be notified when the Department learns the alleged abuser has been indicted of a charge related to sexual abuse; or when the Department learns the alleged abuser was convicted on a charge related to sexual abuse treatment.

The facility reported 20 PREA allegations during the eight (8) month review period. Seventeen reported allegations alleged acts of sexual abuse and four alleged acts of sexual harassments. Ten investigations were completed, and 10 investigations remained pending that included two criminal investigations. A review of the 10 completed PREA investigative case files, confirmed all inmates were notified of the investigative findings. The reviewed investigations included both staff on inmate and inmate on inmate sexual harassment and sexual abuse. Confirmation of the agency's policies and procedures to inform victims of the standard provisions upon arrest, convictions, termination of staff, conviction of aggressors, were explained during interviews with the investigative staff and Warden. Per interviews with the Warden, OIG Inspector and GRFC Investigator, and review of 10 completed reports, the alleged victim is given the opportunity to review the investigative report. Information that is not authorized for release to the victim is redacted from the report prior to the review. The victims' signature was noted as receiving the notification of investigative findings.

There were zero substantiated staff on inmate and/or inmate on inmate sexual abuse investigative findings where an alleged aggressor was terminated, charged, convicted based on a charge of sexual abuse during the review period. One staff on inmate sexual abuse allegation was determined as Unfounded and involved touching only during a clothed pat-search. Two staff-on-inmate sexual abuse allegations remained pending. One staff member identified staff-on-inmate sexual abuse allegation resigned prior to the completion of investigations. The remaining eight inmate on inmate sexual abuse allegations remained pending.

Interviews were conducted with three inmates who reported allegations of sexual abuse, all inmates confirmed they received notification of the investigative findings and were offered an opportunity to review the investigative report. There were no substantiated investigative findings and where a staff member and/or an inmate was indicted, convicted, removed and/or transferred.

Based on the review of agency's policies, review of the 11 completed PREA investigative case file, notifications of investigative findings acknowledged by the inmate population, and interviews with the Warden and investigative staff, and inmates who reported allegations of sexual abuse, GRFC meets all provisions of standard 115.73.

115.76	<p>Disciplinary sanctions for staff</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. PREA Investigative Case files 4. Email Identifying Staff Resignation 5. Interview: <ol style="list-style-type: none"> a. GRFC Warden <p>MTC #003E.02 policy prohibits hiring and/or promoting staff who engage in sexual harassment against inmates. Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Disciplinary sanctions for violators of MTC policies relating to sexual abuse or sexual harassment are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for comparable offense by other staff with similar histories.</p> <p>Per a review of the 10 completed PREA investigative casefiles, there were one (1) instance of allegation reported for staff on inmate sexual abuse. The allegation included touching during a clothed pat-search and was determined as Unfounded. There were zero instances where staff was disciplined for a Substantiated allegation of sexual abuse and/or sexual harassment. However, there are two pending investigations for staff on inmate sexual abuse. One staff member resigned prior to the initiation of the investigation. Per an interview with the Warden, staff would be terminated in addition to criminal charges upon a substantiated finding of sexual abuse with an inmate.</p> <p>Based on the review of agency policies, review of documentation that confirms pending investigations of staff on inmate sexual abuse investigations, and interviews with the Warden that an investigative finding of Substantiated sexual abuse investigative would result in termination in addition to criminal charges, it is concluded that GRFC meets all provisions of the standard.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 318">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="229 318 1509 479" style="list-style-type: none"> <li data-bbox="229 318 1509 367">1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="229 367 1509 416">2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons <li data-bbox="229 416 1509 479">3. PREA Investigative Case Files <p data-bbox="229 479 1509 685">115.77 (a) (b) MTC #903E.02 requires that any contractor or volunteer who engage in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. MTC facilities require that any contractor or volunteer who engage in sexual abuse to be prohibited from contact with inmates. GRFC and MTC facilities take remedial measures and prohibit further contact with inmates in the case of any other violation of MTC sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p data-bbox="229 685 1509 837">Per an interview with the Warden, contractors and volunteers' entry into the facility would immediately be removed upon notification of sexual abuse and/or sexual harassment against an inmate. Restricted access into the facility would continue throughout the completion of the investigation. Substantiated acts of sexual abuse would be referred for criminal prosecution and to their relevant licensing bodies as applicable.</p> <p data-bbox="229 837 1509 958">The review of the 10 completed PREA investigations confirmed there were no reported allegations of sexual abuse and/or sexual harassment reported for volunteers and/or contract workers. Therefore, remedial discipline, referral to law enforcement agencies, and reporting to a licensing body was not applicable. GRFC meets all provisions of the standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. Completed PREA Investigative Case Files
4. GRFC/MTC Inmate Handbook
5. Interviews:
 - a. Warden
 - b. Mental Health Administrator

115.78 Pursuant to MTC 903#.02, Inmates are subject disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on- inmate sexual abuse. Inmates are subject disciplinary sanctions pursuant to formal disciplinary process following a criminal finding of guilt for inmate -on-inmate sexual abuse.

MTC facilities offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse. MTC disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent to such contact. MTC prohibits disciplinary actions for report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

The GRFC/MTC Inmate Handbook, includes the rules of prohibited conduct and penalties for infractions committed by the inmate population. Inmates who are found to have committed sexual battery or attempted sexual battery are subjected to 60 disciplinary confinement and may be imposed to the loss of all earned Good Time. Inmates found guilty of sex acts or unauthorized physical contact involving inmates are subject to 30 days disciplinary confinement and the loss of 90 days Good Time earned.

The review of the 10 completed PREA investigations identified six (6) inmate-on-inmate on inmate sexual abuse and three (3) inmate-on-inmate sexual harassment, confirmed their investigative findings were determined as Unsubstantiated. Ten reported sexual abuse investigations remained pending.

The review of each completed investigative casefile, confirmed both the alleged victim and the alleged aggressive were seen by the mental health staff not later than the following day of the reported allegation. However, due to investigative findings that did not substantiate the alleged allegations, therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse were not applicable.

There were zero reported allegations of sexual abuse completed where an inmate and staff member were identified as a substantiated sexual abuse allegation and zero instances where an inmate was subject to discipline. Agency's policy prohibits disciplinary action for a report of sexual made in good faith based upon a reasonable belief that the alleged conducted occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. The one reported staff on inmate sexual abuse allegation was determined as Unfounded. The allegation alleged staff touch of his genitals during a clothed pat-search. Although the investigative finding was determined as Unfounded, the alleged inmate victim did not receive discipline.

MTC prohibits all sexual activity between inmates. Inmates are subject to discipline for actions of sexual abuse only if the activity was determined to be coerced.

Interviews with the Warden indicated inmates who are determined to have committed sexual abuse would receive disciplinary sanctions that includes the loss of earned good time, placement in close management security status and would be referred for criminal prosecution by the court system for an additional sentencing. The inmate would also be recommended for a transfer to another Florida Department of Corrections facility.

Per an interview with the mental health administrator, the facility does offer normal therapy, and counseling to the inmate population for inmates who are already receiving counseling services, individual cognitive behavior therapy would be offered. Services are available to the inmate population that do not require a condition of participation as an access to the available program.

Based on the review of agency policy, completed PREA investigations, inmate handbook, interviews with Warden and mental health staff, GRFC does meet all provisions of the standard.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. MTC #904E.310 Medical 4. Interviews: <ol style="list-style-type: none"> a. Staff who conduct risk screening b. Medical and mental health staff c. Inmates who reported prior sexual abuse <p>115.81 (a) (b) (c) (d) (e) MTC #903E.02 states all inmates at MTC facilities who have disclosed and prior sexual victimization during a screening pursuant to 115.41 are offered a follow-up meeting with a medical or mental health practitioner. MTC will take appropriate steps to ensure that the follow-up meeting is offered within 14 days of the intake screening. MTC's medical and mental health staff maintain secondary materials. (e.g., form, log) documenting compliance with the above required services. All prison inmates who have ever previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.</p> <p>Per the PAQ, and interviews with the GRFC PREA Compliance Manager and Classification Supervisor, 797 inmates reported to GRFC during the 8-month review period under the management of MTC. Staff who conducts risk screening, confirmed inmates identified as a prior victim of sexual abuse and/or an aggressor of sexual abuse are referred to mental health where they will be seen normally within 7 days. The facility identified seven (7) inmates reported prior sexual victimization and one (1) inmate reported a history of sexual aggressiveness upon their arrival at GRFC during the eight (8) review month. Three (3) inmates were randomly selected for interviews, and all confirmed they were seen by mental health upon their arrival and again within two weeks of their arrival. Documentation supported each of the seven (7) prior victims and one (1) prior aggressor were seen within seven (7) of the submitted referrals.</p> <p>MTC #904E.310 states any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans, and security and management decisions, including housing, bed, work, and education, and program assignments, or as otherwise required by Federal, State, or local law. Interviews with medical and mental staff confirmed all inmates sign a consent form upon their arrival at GRFC that authorizes staff to release medical and mental health information without violating the HIPAA laws. All confirmed the facility has not and will not house offenders under the age of 18 years old.</p> <p>Based on the review of agency policies, documentation of completed mental health referrals within 7 days, interviews with staff who conduct risk screenings, medical and mental health staff, and inmates who reported prior sexual abuse, GRFC does meet all provisions of the standard.</p>

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

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. Florida Department of Correction #602.053 Prison Rape: Prevention, Detention, and Response
4. PREA Investigative Case Files
5. Inmate's Medical and Mental Health Documentation

Interviews

- a. Medical and Mental Health Professionals
- b. Inmates who Reported Sexual Abuse

115.82 (a) (b) (c) (d) MTC/GRFC's medical and Mental Health staff maintain secondary materials (e.g. form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.

Interviews with a License Practical Nurse, Acting Health Services Administrator and the Mental Health Professional confirmed all inmates who reported allegations of sexual abuse receive both medical and mental health services. Medical staff are assigned to the facility 24/7 and medical care is immediately provided to the inmate. Applicable forensic medical examinations conducted by SANE was documented as performed upon the arrival of the SANE at the upon notification by the OIG on the night/day of the reported incident. Mental health staff are scheduled normal business hours Monday – Friday and are on call 24-7 to report as needed. Per medical and mental health staff, the level of services provided by their departments is based on their professional judgement, agency policies, in addition to state and federal laws. The review of medical and mental health services provided to the alleged victims and alleged aggressors for both sexual abuse and sexual harassment allegations confirmed all inmates were by medical staff upon reporting the allegations. Most mental health evaluations were completed on the day of the reported allegation and always within 72- hours of the reported allegation. Interviews conducted with three (3) inmates who reported sexual abuse, confirmed they were seen immediately by both medical and mental health staff as documented.

Fifteen (15) inmates reported allegations of sexual abuse. However, all did not include penetration. The auditor conducted the review of the five (5) completed sexual abuse casefiles and the preliminary investigative file of the ten (10) pending investigative case files for confirmation of medical and mental health services. All investigative case files confirmed the alleged sexual battery protocols were initiated by GRFC medical staff on all alleged victims and their identified aggressor(s) immediately upon reporting the sexual abuse. The sexual battery protocols were also initiated for the victims and aggressors of reported sexual harassments. GRFC is an adult male facility and does not house female inmates. The alleged sexual battery protocol documents an extensive evaluation of the inmates involved, their reported injuries, and any identified injuries, prophylaxis medication given, instructions given to the inmates to include the completion of medication, and lab tests collected for HIV, Hepatitis B, Hepatitis C, syphilis, gonorrhea, and chlamydia, and guidance on repeated lab work, and follow-up visits with both medical and mental health. Inmates who elect to refuse lab/diagnostic testing, medication, mental health services, medical services, dental services, and/or the forensic sexual assault examination by the Panhandle SART nurses are required to sign the FDOC Refusal of Health Care Services Form. Although all inmates were provided a medical examination by GRFC staff, several inmates refused additional medical treatment to include lab work, testing for sexually transmitted diseases, and appropriate medication. Their refusal was documented as witnessed by the attending health services staff and the on-scene OIG Investigator. Interviews conducted with three (3) inmates who reported sexual abuse confirmed they were offered medical treatment to include medication.

MTC # 903E.02 and MTC 904.310 dictates 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. Interviews with the mental health and medical staff confirmed all victims would receive medical and mental health services regardless of their cooperation during the investigation of their sexual assault to include refusing to identify the alleged aggressor.

Based on the review of agency policies, review of sexual abuse case files, inmate's medical and mental health documentation within these files, interviews with three inmates who reported allegations of sexual abuse, and medical and mental health staff, GRFC does meet all provisions of the standard.

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ)
2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons
3. Florida Department of Correction #602.053 Prison Rape: Prevention, Detention, and Response
4. PREA Investigative Case Files
5. Inmate's Medical and Mental Health Documentation

Interviews

- a. Medical and Mental Health Professionals
- b. Inmates who Reported Sexual Abuse

115.83 (a) (b) (c) (d) (e) (f) (g) (h) MTC facilities 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 facilities.

Interviews with a License Practical Nurse, Acting Health Services Administrator and the Mental Health Professional confirmed all inmates who reported allegations of sexual abuse receive both medical and mental health services. Medical staff are assigned to the facility 24/7 and medical care would be immediately provided to the inmate. Mental health staff are scheduled normal business hours Monday – Friday and are on call 24-7 to report as needed.

Fifteen (15) inmates reported allegations of sexual abuse. However, all did not include penetration. The auditor conducted the review of the five (5) completed sexual abuse casefiles and the preliminary investigative file of the ten (10) pending investigative case files for confirmation of medical and mental health services. All investigative case files confirmed the alleged sexual battery protocols were initiated by GRFC medical staff on all alleged victims and their identified aggressor(s) immediately upon reporting the sexual abuse. The sexual battery protocols were also initiated for the victims and aggressors of reported sexual harassments. GRFC is an adult male facility and does not house female inmates. The alleged sexual battery protocol documents an extensive evaluation of the inmates involved, their reported injuries, and any identified injuries, prophylaxis medication given, instructions given to the inmates to include the completion of medication, and lab tests collected for HIV, Hepatitis B, Hepatitis C, syphilis, gonorrhea, and chlamydia, and guidance on repeated lab work, and follow-up visits with both medical and mental health. Inmates who elect to refuse lab/diagnostic testing, medication, mental health services, medical services, dental services, and/or the forensic sexual assault examination by the Panhandle SART nurses are required to sign the FDOC Refusal of Health Care Services Form. Although all inmates were provided a medical examination by GRFC staff, several inmates refused additional medical treatment to include lab work, testing for sexually transmitted diseases, and appropriate medication. Their refusal was documented as witnessed by the attending health services staff and the on-scene OIG Investigator. Per medical and mental health staff, the level of services provided by their departments to the inmate population are equal to that within the local communities if not better and is based on their professional judgement, agency policies and state and federal laws.

Three (3) who reported allegations of sexual abuse received forensic medical examinations by a SANE with the Panhandle Sexual Assault Response Team in Marianna, FL. The SART Nurse reports to the facility to conduct the forensic medical examination upon being requested by the assigned OIG Investigator. The results of the testing and investigations remained pending throughout the audit.

MTC # 903E.02 and MTC 904.310 dictates 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. Interviews with the mental health and medical staff confirmed all victims would receive medical and mental health services regardless of their cooperation during the investigation of their sexual assault to include refusing to identify the alleged aggressor. Interviews were conducted with three (3) inmate who reported allegations of sexual abuse. The three inmates reported they were immediately seen by medical and mental health upon reporting the alleged sexual abuse. One was reported outside the 72-hour forensic testing period. The remaining two inmates' incidents alleged oral sex, however, they had previously brushed their teeth and cleaned themselves prior to reporting. These inmates acknowledged receiving medication and were not advised of any financial responsibility for medical and/or mental services received.

The mental health professional indicated a mental health evaluation is offered within 7 days of inmates identified as an aggressor rather than 60 days after learning of such abuse history. Available services are offered to the inmate.

Based on the review of agency policies, review of sexual abuse case files, inmate's medical and mental health documentation within these files, interviews with three inmates who reported allegations of sexual abuse, and medical and mental health staff, GRFC does meet all provisions of the standard.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management and Training Cooperation (MTC) #903E.02 Sexual Safety in Prisons 3. Completed Sexual Abuse Incident Reviews <p>Interviews:</p> <ol style="list-style-type: none"> a. Warden b. PREA Compliance Manager c. Member of the Incident Review Team <p>115.86 (a) (b) (c) (d) (e) MTC #903E.02 outlines the agency's requirements to conduct sexual abuse incident reviews in accordance with all provisions of the standard. Incidents reviews are conducted not later than 30 days of the completed investigation for all reported allegations of sexual abuse except for those with an investigative finding of unfounded. An interview conducted with a member of the incident review team confirmed the incident review team considers all elements within the standard provision during all sexual abuse investigations that are determined as substantiated and/or unsubstantiated. The facility reported 15 sexual abuse allegations during the 8-month review period. Ten reported sexual abuse investigations remained pending throughout the audit process. Five (5) sexual abuse investigations were completed with an investigative finding of unsubstantiated. An incident review was completed for each of the unsubstantiated sexual abuse investigations. Each of the five (5) incident reviews were completed within 30 days of the completed investigations. The incident reviews documented the consideration of the following: a need to change policy or practices to better prevent; detect or response to sexual abuse; whether the allegation appeared to motivated by race, ethnicity, gender identity, gay, bi-sexual, transgender, or intersex identification, gang affiliation, possible physical barriers in the area that may have contributed to the alleged abuse; or was the sexual abuse motivated or otherwise caused by other group dynamics at the facility; adequate staffing levels during the alleged incident; monitoring technology in addition to identifying whether are not recommendations for improvement were applicable. These factors were also identified by the Warden, and GRFC PREA Compliance Manager. The incident review team members were identified as the Chief of Security, Warden, GRFC PREA Compliance Manager, Classification Supervisor with input provided by the line supervisors, investigators and medical and mental health practitioners.</p> <p>Based on the review of agency's policy, date of completion of the five (5) completed sexual abuse investigative case files and the completion of the incident reviews completed within 30 days of the investigative findings, interviews with staff who serve on the incident review team, Warden and GRFC PREA Compliance Manager. it is determined GRFC does meet all provisions of the standard.</p>

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	<p data-bbox="240 208 451 235">Auditor Discussion</p> <p data-bbox="240 271 813 297">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="240 327 1090 640" style="list-style-type: none"> <li data-bbox="240 327 1090 353">1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) <li data-bbox="240 383 1058 409">2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons <li data-bbox="240 439 480 465">3. MTC agency website <li data-bbox="240 495 501 521">4. Annual PREA Reports <li data-bbox="240 551 368 577">5. Interview: <ol data-bbox="240 607 512 633" style="list-style-type: none"> <li data-bbox="240 607 512 633">a. MTC PREA Coordinator <p data-bbox="240 669 1453 732">115.87(a) (b) (c) (d) (e) (f) In accordance with MTC #903E.02, MTC collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions,</p> <p data-bbox="240 763 1485 956">The standard instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the department of Justice. MTC aggregates the incident-based sexual abuse data at least annually. The GRFC PREA Compliance Manager and the MTC PREA Coordinator maintain, review and collect data as needed for all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The MTC agency provides the Department of Justice with request data from the designated time period year upon request.</p> <p data-bbox="240 987 1477 1180">The MTC PREA Coordinator, indicated she began in April of each year, collecting and review data from the various facilities for the submission of the annual report on June 30th of each year. She and the Assistant PREA Coordinator are able to collect data from the previous years that includes a comparison that is included in each annual report that is posted on the agency's website. However, the contract between the Department of Management Services, Management & Training Corporation and GRFC became effective September 1, 2021. GRFC was previously operated under the management supervision of GEO.</p> <p data-bbox="240 1211 1473 1274">Based on the review of agency policy, term of the contract between the various agencies, review of the MTC website which documents its compliance to the PREA standard, the agency does meet the provisions of the standard.</p>

115.88	Data review for corrective action
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 208 451 237">Auditor Discussion</p> <p data-bbox="242 271 813 300">Evidence Reviewed (documents, interviews, site review):</p> <ol data-bbox="242 327 1086 757" style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. MTC agency website 4. Annual PREA Reports 5. Interviews: <ol data-bbox="242 613 643 757" style="list-style-type: none"> a. MTC Agency Head b. Graceville PRE Compliance Manager c. MTC Agency PREA Coordinator <p data-bbox="242 786 1493 1081">115.88 (a) (b) (c) In accordance with MTC #903E.02, outlines the mandate of provisions within the standard. MTC review data collected and aggregated pursuant to 115.87, in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: i) identifying problem areas; ii) Taking corrective action on an ongoing basis; iii) Preparing an annual report of its findings from its data review and any corrective action for each facility as well as the agency as a whole. A review of the annual report includes a comparison of each current year and any corrective action with those from prior year. A review of annual reports for 2021-2020; 2020 versus 2019 confirmed compliance of the standard provisions. However, an annual report for the GRFC was not included on the agency's website as the GRFC become operational under the MTC on September 1, 2021. The Annual PREA Reports for MTC is located on the agency's website at https://www.mtctrains.com/prea/</p> <p data-bbox="242 1111 1485 1205">Per an interview with the facility PREA Compliance Manager, she and the facility investigator work together to in gathering of data for the submission of review. The review includes methods of improvements in the effectiveness of preventing sexual abuse that includes additional training to staff.</p> <p data-bbox="242 1234 1477 1364">The MTC PREA Coordinator, indicated she began in April of each year, collecting and review data from the various facilities for the submission of the annual report on June 30th of each year. She and the Assistant PREA Coordinator are able to collect data from the previous years that includes a comparison that is included in each annual report that is posted on the agency's website.</p> <p data-bbox="242 1393 1490 1588">Per the Agency head, the annual review has been conducted each since the beginning of 2012. Each calendar year, a report is published for the previous year. The agency PREA Coordinator has been assigned the responsibility to: identify areas of noncompliance with policy; analyze trends in allegations of sexual abuse and harassment, as well an investigative determination ; collaborate on best practices; develop solutions based on consideration of various constraints; provide the field with clarification through interpretive guidance, and overseeing the implementation of agreed upon decisions related to necessary changes to policy, physical plant, staff and/or training.</p> <p data-bbox="242 1617 1493 1711">Based on the review MTC policy, agency website and review of the Annual PREA Reports that includes a data comparison of current and previous years, and interviews with MTC PREA Coordinator, MTC Agency Head, and facility PREA Compliance Manager, the agency does meet all provisions of the standard.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. Graceville Correctional Facility (GRFC) Completed Pre-Audit Questionnaire (PAQ) 2. Management & Training Corporation (MTC) #903E.02 Sexual Safety in Prisons 3. MTC agency website 4. Annual PREA Reports 5. Interview: 6. MTC PREA Coordinator <p>115.89 (a) (b) (c) (d) Pursuant to MTC #903E.02, MTC ensure that incident -based and aggregate data are securely retained. MTC aggregated sexual abuse data from MTC facilities under tis direct control are made readily available to the public at annually through its website. Before making aggregated sexual abuse data publicly available MTC removes all personal identifiers. MTC maintains sexual abuse dated collected pursuant to standard 115.87 for not less than 10 years after the date of initial collection, unless federal, state, or local law requires otherwise. Per a review of the agency’s website the final reports were made available annually to the public and did not include any personal identifiers. An interview with the MTC PREA Coordinator, any information that could possibility identify individuals and or could pose a threat to the security of a facility are excluded from the reports prior to publishing on the agency’s website. The data is electronically stored with limited access and is maintained in an excess of 10 years.</p> <p>Based on the review of agency’s policy, agency’s website, and interview with the agency PREA Coordinator, GRFC and the agency (MTC) does meet all provisions of the standard.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	<p data-bbox="242 208 451 235">Auditor Discussion</p> <p data-bbox="242 271 1465 427">115.401 This is the third year of the third audit cycle for GRFC. Effective September 1, 2021, GRFC became under the management of the Management & Training Corporation (MTC). A review of the MTC website confirmed the posting of the GRFC's PREA Audit completed on February 2, 2019. The review of the MTC agency website at https://www.mtctrains.com/prea/siteconfirmed correctional facilities under its management were posted each year of cycle one, cycle two and cycle three.</p> <p data-bbox="242 463 1469 589">The auditor was provided full access to all buildings and areas during the tour and throughout the site visit. Areas observed during the site visit included but was not limited to the following: housing units, food service, medical, mental health, administrative offices, inmate program areas, inmate restricted housing units, maintenance, warehouse, mailroom, religious services, observation of inmate risk screening, visitation area, and recreation.</p> <p data-bbox="242 620 1485 813">The OAS was used to complete the audit process with a review period of September 1, 2021, through May 1, 2022. The auditor was provided with copies of all requested documentation and information to include electronically storage documentation. The auditor requested and received sufficient sampling based on the size of the facility and inmate count, investigative reports, confirmation of background investigations, staff and inmate PREA training, medical, mental health, and investigators specialized training, inmate risk screenings, mental health referrals, and other documents. This information was uploaded in the OAS for review.</p> <p data-bbox="242 844 1485 969">The auditor received confirmation of the PREA Audit Notice Posting on May 23, 2022. The notice was posted six weeks prior to the first day of the site visit. The PREA Audit Notice was observed posted throughout the facility upon entering the front entrance, visitation, recreation, food services, program areas, administration, intake, mental health, medical, and housing units accessible for all offender population and staff.</p> <p data-bbox="242 1001 1469 1126">The auditor and non-certified support staff were provided office space to conduct all inmate and staff interviews in a private setting. Interviews were conducted with random and specialized staff in addition to random and target group inmates. The inmate's count on the first day of the site visit was 1866. Thirty inmates were selected for random interviews and twenty-two were selected for the targeted groups interviews.</p> <p data-bbox="242 1158 1485 1283">An interview with staff assigned to the mailroom confirmed for security concerns, all outgoing inmate mail is unsealed prior to being screened by staff. However, inmate mail identified as related to PREA is sealed, treated as legal mail, and is not read prior to sealing by staff before to forwarding to the identified outgoing address. The auditor did not receive any confidential mail from GRFC staff and/or the inmate population. No offenders and/or staff requested to speak with the auditor.</p> <p data-bbox="242 1314 1326 1344">Based on the above, the facility has demonstrated substantial compliance with all provisions of this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 434">115.403 This is the third year of the third audit cycle for GRFC. Management of the GRFC became the responsibility of the Management & Training Corporation (MTC) effective September 1, 2021, upon being awarded the contract. Prior to September 1, 2021, the facility was operated by The GEO Group, Inc. The most recent GRFC PREA audit was completed on February 2, 2019, under the operation of The GEO Group Inc., and was posted on its agency's website at https://www.geogroup.com.</p> <p data-bbox="229 434 1509 524">Based on the contract operational management of GRFC awarded to the MTC on September 1, 2021, MTC did not have operating authority during cycle one and cycle two PREA review periods.</p> <p data-bbox="229 524 1509 613">However, a review of correctional facilities operated by the MTC during previous PREA cycles does confirm, the facility's PREA audits were made available to the public on its agency's website at https://www.mtctrains.com/prea/</p> <p data-bbox="229 613 1509 687">Therefore, Management and Training Corporation and GRFC does meet the requirements of the 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.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	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.)	na
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?	no
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na

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

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

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

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	no
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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.)	na
	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.)	yes
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.)	yes
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).)	yes
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.)	yes
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective 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?	no
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.)	na
	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.)	na
	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.)	na
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.	yes
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?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

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

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

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
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.)	na
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.)	yes
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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
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