

PREA Facility Audit Report: Final

Name of Facility: John I. Easley Criminal Justice Center

Facility Type: Prison / Jail

Date Interim Report Submitted: 09/10/2023

Date Final Report Submitted: 10/12/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Brian D. Bivens	Date of Signature: 10/12/ 2023

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	07/31/2023
End Date of On-Site Audit:	08/01/2023

FACILITY INFORMATION	
Facility name:	John I. Easley Criminal Justice Center
Facility physical address:	408 Century Court, Franklin, Tennessee - 37064
Facility mailing address:	

Primary Contact	
Name:	Ashley Lindquist
Email Address:	ashley.lindquist@williamsoncounty-tn.gov
Telephone Number:	6292149517

Warden/Jail Administrator/Sheriff/Director	
Name:	Carole Esteban
Email Address:	Carole.esteban@williamsoncounty-tn.gov
Telephone Number:	6154567483

Facility PREA Compliance Manager	
Name:	Seth Obermeyer
Email Address:	seth.obermeyer@williamsoncounty-tn.gov
Telephone Number:	O: 6156267949

Facility Health Service Administrator On-site	
Name:	JENNIFER ELAM
Email Address:	JELAM@FAH.CARE
Telephone Number:	615-790-5560

Facility Characteristics	
Designed facility capacity:	454
Current population of facility:	316
Average daily population for the past 12 months:	366
Has the facility been over capacity at any point in the past 12 months?	No

Which population(s) does the facility hold?	Both females and males
Age range of population:	18-79
Facility security levels/inmate custody levels:	MINIMUM, MEDIUM AND MAXIMUM
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	76
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	25
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	127

AGENCY INFORMATION

Name of agency:	Williamson County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	408 Century Court, Franklin, Tennessee - 37064
Mailing Address:	
Telephone number:	6157905560

Agency Chief Executive Officer Information:

Name:	Dusty Rhoades
Email Address:	dusty.rhoades@williamsoncounty-tn.gov
Telephone Number:	615-790-5560

Agency-Wide PREA Coordinator Information

Name:	Ashley Lindquist	Email Address:	ashley.lindquist@williamsoncounty-tn.gov
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

1	<ul style="list-style-type: none"> • 115.64 - Staff first responder duties
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Number of standards met:

44	
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Number of standards not met:

0	
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POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-07-31
2. End date of the onsite portion of the audit:	2023-08-01

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:	The Sexual Assault Center of Nashville

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	454
15. Average daily population for the past 12 months:	316
16. Number of inmate/resident/detainee housing units:	21
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:	298
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:	2
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:	1
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:	0
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:	3
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:	11

<p>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:</p>	<p>0</p>
<p>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:</p>	<p>4</p>
<p>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:</p>	<p>5</p>
<p>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:</p>	<p>0</p>
<p>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):</p>	<p>There were no inmates in the facility during the onsite visit that were transgender, deaf/hearing impaired, and or had been placed in segregation for risk of sexual victimization. This was verified during conversations with segregation staff and the PREA Coordinator.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>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:</p>	<p>76</p>
<p>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:</p>	<p>127</p>

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:	25
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:	10
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 checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The facility supplied a list of resident names sorted by housing units, disabilities, and special designations, as well as a list of facility staff names to the auditor. From these lists the auditor selected, at random, a sampling of residents and staff to be interviewed during the on-site visit. This decision was made to ensure all residents throughout the facility were receiving the same information and education related to all aspects of the PREA program instituted at this facility.</p> <p>There were <u>twenty inmates interviewed</u> during the on-site visit. All of the inmates interviewed acknowledged receiving PREA training and written materials in languages that they could comprehend (posters, pamphlets, and resident handbooks) outlining the agencies zero tolerance policies towards sexual abuse, sexual harassment, and retaliation for reporting, as well as the procedures for reporting. There were two out of twenty inmates did not remember if they had been screened during the intake process. Records check showed all inmates were screened within 72 hours of intake.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>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):</p>	<p>Records indicate the PREA video is played routinely in the housing areas; twenty-six out of twenty-six inmates indicated the PREA video is played in each housing unit daily. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and that all PREA complaints were taken very serious by staff at this facility. All inmates stated they felt safe in the facility.</p>

Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	16
<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:	1
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0

<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>It was determined through a conversation with the PREA Coordinator, there were no deaf or hearing-impaired inmates in the facility during the onsite portion of the audit.</p>
<p>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:</p>	<p>3</p>
<p>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:</p>	<p>4</p>
<p>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:</p>	<p>0</p>
<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>It was determined through a conversation with the PREA Coordinator, there were no transgender inmates in the facility during the onsite portion of the audit.</p>
<p>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:</p>	<p>2</p>
<p>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:</p>	<p>3</p>
<p>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:</p>	<p>0</p>
<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>It was determined through a conversation with the PREA Coordinator, there were no inmates placed in segregation for victimization in the facility during the onsite portion of the audit.</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>Records indicate the PREA video is played daily in the housing areas; twenty-six out of twenty-six inmates indicated they were aware of the PREA video. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and that all PREA complaints were taken very seriously by staff at this facility. All inmates stated they felt safe in the facility.</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>12</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 type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</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>All staff and residents informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment, and/or retaliation for reporting. The auditor found the staff to be well versed in their duties as PREA 1st Responders.</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>15</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes <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 <input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input type="checkbox"/> Other
81. Did you interview VOLUNTEERS 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 VOLUNTEERS who were interviewed:	2
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 checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

<p>83. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>Contract medical and mental services are provided by Fast Access Healthcare. . There is no SAFE or SANE staff at the facility; they are would be performed at Williamson Medical Center. The Williamson County Sherriff’s Office has entered into a Memorandum of Understanding with Sexual Assault Center of Nashville to provide for Victim Advocate Services.</p>
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SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

<p>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)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>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)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>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).</p>	<p>Following the entrance meeting, the auditor conducted a comprehensive site review that began at approximately 09:00 a.m. and continued throughout the onsite visit. During the site review the auditor reviewed camera placement, blind spots, staff placement and documentation to assist in determining standard compliance. While touring the facilities the auditor observed the notices of this PREA audit in the main public lobby; as well as, all the housing units, as well as posters (Speak Up) that called attention to the agency's Zero Tolerance Policy and how to report allegations of sexual abuse and sexual harassment. Random staff and resident interviews were conducted in private areas (Office and Interview Room).</p>
<p>Documentation Sampling</p>	
<p>Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.</p>	
<p>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?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>The auditor completed the following file reviews:</p> <table border="0"> <tr> <td>Human Resource Files</td> <td>Volunteers</td> </tr> <tr> <td></td> <td>Contract</td> </tr> <tr> <td>Employees</td> <td>Staff</td> </tr> <tr> <td>Training Records</td> <td></td> </tr> <tr> <td>Volunteers</td> <td></td> </tr> <tr> <td>Contract Employees</td> <td>Staff</td> </tr> <tr> <td>PREA Investigation Files</td> <td></td> </tr> <tr> <td>Offender PREA Records</td> <td></td> </tr> </table>	Human Resource Files	Volunteers		Contract	Employees	Staff	Training Records		Volunteers		Contract Employees	Staff	PREA Investigation Files		Offender PREA Records	
Human Resource Files	Volunteers																
	Contract																
Employees	Staff																
Training Records																	
Volunteers																	
Contract Employees	Staff																
PREA Investigation Files																	
Offender PREA Records																	

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	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	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	0	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	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	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	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	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:

1

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any 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>1</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-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 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>1</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 checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<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>1</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any 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>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
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.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff

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

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

The audited facility or its parent agency

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

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

Other

Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none"> • 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
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002, pages 3-4 and 7-13 4. Organizational Chart (06.01.2023) <p>B. Interview</p>

1. PREA Coordinator
 2. Random Staff Interviews
 3. Random Offender Interviews
- C. Other
1. Tour
 2. PREA Signage

115.11 (a) The Williamson County Jail staff follows the Williamson County Sheriff's Office General Order 10.6.002 on Sexual Harassment/Sexual Abuse which mandates a zero tolerance for all forms of sexual abuse and sexual harassment. This General Order 10.6.002 pages 3-4 and pages 7-13, outlines the agency's approach to preventing, detecting, and responding to such conduct. The policy includes a description of the agency's strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates. Random interviews with staff and offenders revealed that zero-tolerance is a part of the agency's culture. During the tour, the auditor noticed PREA information posted throughout the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.11 (B) and (C) The agency employs an upper-level, agency-wide PREA Coordinator. The Williamson County Job Description outlines the responsibilities of the PREA Coordinator. Sgt. Ashely Lindquist was appointed as the agency-wide PREA Coordinator by Captain Youker on May 29, 2023. The facility provided the auditor with the organizational chart showing the PREA Coordinator position as an upper-level, agency-wide position. The PREA Coordinator is knowledgeable of the PREA standards and actively assists the facility with compliance. The PREA Coordinator has the authority to develop, implement, and oversee PREA compliance. Sgt. Lindquist is actively updating the facility as new Frequently Ask Questions (FAQs) results are published on the PREA Resource Center website. The auditor did make a recommendation that Sgt. Lindquist completed a PREA Coordinator Course. The Williamson County Sheriff's Office operates one jail facility; therefore, the agency does not have a PREA Manager. During interviews with the PREA Coordinator, she indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist <p>B. Interviews</p> <ol style="list-style-type: none"> 1. Random Staff 2. PREA Coordinator <p>C. Other</p> <ol style="list-style-type: none"> 1. Auditor Observation <p>Based on the documentation provided, auditor observation, interviews with the PREA Coordinator, and random staff; as well as random staff interviews; it was determined the John I. Easley Criminal Justice Center does not contract with other facilities to house inmates assigned to their custody. Therefore, this standard was found to be compliant with this facility during this audit.</p>

<p>115.13</p>	<p>Supervision and monitoring</p>
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files

2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002, pages 4-5
4. Staffing Plan
5. Staffing Deviation Forms
6. Employee Schedules/Rosters
7. Unannounced Round Documentation (Shift Activity Logs)
8. Annual Staffing Review

B. Interviews

1. Jail Administrator
2. PREA Coordinator
3. Upper-Level Supervisors conducting Unannounced Rounds (2)

C. Other

1. Personal Observation during Site Review

The following delineates the audit findings regarding this standard:

115.13 (a) Williamson County Sheriff's Office General Order 10.6.002, page 4, states that the facility has documented and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing as described and required by this standard. The staffing levels are monitored daily by review of shift rosters. An interview with the Jail Administrator confirmed this practice. The auditor observed that actual deployment practices reflect the deployment described in the staffing plan. During the site review, the auditor observed staffing levels were adequate, considering the physical plant and duty posts. The Staffing plan does not address every component of this standard.

Corrective Action:

The agency should follow the guidelines of General Order 10.6.002 and document a staffing plan that addresses each component of the requirements of this standard. The staffing plan should take into consideration:

- Generally accepted detention and correctional practices

- Any judicial findings of inadequacies (there were none at the time of the site review)
- Any findings of inadequacies from Federal investigation oversight agencies (there were none at the time of the site review)
- Any findings of inadequacy from internal or external oversight bodies (there were none at the time of the site review)
- All components of the facility's physical plant (Intake/Kitchen/Laundry)
- The composition of the inmate population (adult males and adult females only)
- The number and placement of supervisory staff (one per shift)
- Institution programs occurring on a particular shift (classroom)
- Any applicable State or local laws, regulations, or standards (Tennessee Corrections Institute Standards)
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse, and
- Any other relevant factors.

Response to Corrective Action:

The Facility Administration updated the facility's staffing plan to include all components of standard 115.13. The revised plan was updated and reviewed by the Facility Administration and forwarded to the Sheriff in September 2023. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on the Staffing Deviation Form and submitted to the Jail Administrator outlining the reason(s) for the deviation. Staff call-outs are dealt with by giving staff overtime. The Staffing Deviation Form would be utilized to document any deviations. The form lists eight different reasons for the deviations, including:

1. Employee Sick
2. Employee Training
3. Inmate at Hospital/Medical Run

	<ol style="list-style-type: none"> 4. Special Teams Callout 5. Weather 6. FMLA 7. On-the-Job Injury 8. Other (Specify) <p>The mandatory staffing levels for each shift are also listed on the form, along with the steps taken to correct the staffing deviation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Jail Administrator and Sheriff for review and approval of any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. This process is outlined in Williamson County Sheriff’s Office General Order 10.6.002 page 4. The last Annual Staffing Plan assessment was completed in 2022. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.13 (d) Based on John I. Easley Criminal Justice Center Shift Supervisor facility logs, staff interviews, Williamson County Sheriff’s Office General Order 10.6.002 page 5, and other documentation provided. The on-duty supervisor is required to conduct and document unannounced rounds on all shifts as required on the “Shift Activity Log”. Rounds are conducted and documented at least once every shift. Rounds are completed each shift and two supervisors that were interviewed stated they change their routine or pattern each day to ensure that staff and inmates are not alerted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents

	<ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Jail Administrator <p>C. Other</p> <ol style="list-style-type: none"> 1. Auditor Observation <p>Based on the information provided and interviews with the Jail Administrator and the PREA Coordinator, the John I. Easley Criminal Justice Center is an all-adult facility and does not house youthful offenders. Therefore, this standard was found to be in compliance with this facility during this audit.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002, pages 6 and 7 4. Williamson County Sheriff's Office General Order 10.19.001 (Searches) 5. Training PowerPoint (Prison Rape Elimination Act {PREA} Employee Training and Sign-In Sheets <p>B. Interviews</p>

1. Random Staff
2. Random Inmates

C. Other

1. Observation during Site Review

The following delineates the audit findings regarding this standard:

115.15 (a) Williamson County Sheriff's Office General Order 10.6.002, pages 6 and 7 outlines offender searches including searches of transgender and intersex offenders. The review of the Training PowerPoint (Prison Rape Elimination Act {PREA} Employee Training and staff interviews revealed cross-gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. The agency has logs to document exigent circumstances when appropriate. There have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. Twelve out of twelve random staff members interviewed, stated they had not completed a cross-gender patdowns. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (b) Williamson County Sheriff's Office General Order 10.19.001 page 4 prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. Interviews with random staff confirm this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The PREA Coordinator confirmed there were no occasions where male employees searched any female inmate, either frisk/pat or strip-search. Twenty-six out of twenty-six random inmates interviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (c) Williamson County Sheriff's Office General Order 10.19.001 page 5 prohibits frisk/pat searches of female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. The policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented. The PREA Coordinator advised there have not been any cross-gender strip searches or visual body cavity searches in the past twelve months. The agency has logs to document exigent circumstances when appropriate. The PREA Coordinator confirmed there were no occasions where either frisk/pat or strip-search was completed under exigent circumstances in the past twelve months. Twenty-six out of

twenty-six inmates interviewed confirmed this practice. Twelve out of twelve interviews with random staff confirm this practice. All twelve staff members interviewed, stated there was always at least one male and one female on duty at all times. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (d) Williamson County Sheriff's Office General Order 10.6.002 page 6 outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without a non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets, and changing their clothes. Williamson County Sheriff's Office General Order 10.6.002 also requires a staff of the opposite gender to announce their presence prior to entering the housing units. Even in incidents pertaining to suicide cells, Williamson County does not allow opposite-gender viewing. The John I. Easley Criminal Justice Center did not house a transgender inmate during the onsite visit. The auditor observed all areas where confined persons may be in a state of undress, such as showering, using the toilet, and /or changing their clothes. The auditor did observe electronic surveillance monitoring areas such as control rooms where staff monitor live or recorded video feeds of offenders. The auditor also observed "opposite gender announcements" being made during the tour of the facility. Random inmate and staff interviews revealed that opposite-gender announcements were common practice at this facility. Several inmates expressed concern over the number of cameras in the dayroom and around the shower/toilet areas. The auditor reviewed all camera angles in the facility, and it was determined employees monitoring the cameras near the showers/toilets could not see inside the showers or see someone sitting on a toilet. There were some cameras viewing inside cells; toilets were blacked out in those cells. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (e) Based on Williamson County Sheriff's Office General Order 10.6.002 page 7, training curriculum (LBGT- Corrections Training) provided and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. Staff training files showed all completed the approved training. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. At the time of the site review, there was not a transgender/ intersex inmate housed in the facility. During the past twelve months, there were no incidents where the Medical Staff had to perform an examination that fell within said parameters. General Order 10.6.002 requires the staff to ask transgender offenders their gender preference for pat-downs. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (f) Based on Williamson County Sheriff's Office General Order 10.6.002 pages 6 and 7, the training curriculum provided (LBGT- Corrections Training), staff training file reviews, and staff interviews the facility trains security staff to conduct cross-

	<p>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. It is the agency's policy to ask transgender inmates their gender preference for staff conducting pat-downs. A training report indicated every employee had successfully completed PREA training. Slide #35 of the Training PowerPoint on searches addresses this issue. The John I. Easley Criminal Justice Center did not have a transgender/intersex inmate housed in the facility during the onsite portion of the audit. According to the PREA Coordinator, there were also no complaints filed by the LBGTI inmate in the past twelve months related to searches. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 page 8 4. Propio Language Line Documentation 5. Sexual Assault Center of Nashville Informational Flyer (Both in English and Spanish) {Kiosk} <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Random Staff 3. Targeted Inmates

C. Other

1. Purple Communication Video Relay System (VRS)
2. Personal Observation

The following delineates the audit findings regarding this standard:

115.16 (a) Williamson County Sheriff's Office General Order 10.6.002 page 8, ensures that the John I. Easley Criminal Justice Center takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA postings, PREA education videos, and the inmate handbook are provided. The Purple Video Relay (VRS) system was tested on 07/27/23 for functionality by the PREA Coordinator; there were no deaf or hard-of-hearing inmates incarcerated at the time of the onsite portion of the audit. Targeted inmates interviewed included:

- three limited English-speaking inmates
- one with low vision
- one with physical handicaps, and
- two with cognitive impairments

Excluding LEP inmates, all targeted inmates interviewed displayed an understanding of the agency's zero-tolerance, how to report sexual abuse and sexual harassment. There were three limited English-speaking inmates incarcerated at the time of the onsite audit. Two of the three LEP inmates remembered being screened and receiving PREA information upon intake. The one LEP inmate was given the agency's PREA information in Spanish. The inmates and staff also confirmed that interpretive (Propio) services are available when needed. Information for the Sexual Assault Center of Nashville is available both in English and Spanish on the inmate kiosk in each dayroom in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (b) The John I. Easley Criminal Justice Center takes 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, including steps to provide interpreters who can interpret effectively

accurately and impartially. Propio Language Line Services and/or staff interpreters are used to translate at this facility. The agency has utilized the Propio Language Line multiple times in the past twelve months. An invoice for Propio Language services was provided to the auditor confirming the usage of the services provided by Propio. There were three limited English-speaking inmates incarcerated at the time of the onsite audit. Two of the three LEP inmates remembered being screened and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure, and a file review showed he did in fact receive a PREA screening upon intake. The staff also confirmed that interpretive services are available when needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (c) Williamson County Sheriff's Office General Order 10.6.002 page 14 illustrates the agency does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. The Purple Video Relay (VRS) system was tested on 07/27/23 for functionality by the PREA Coordinator; there were no deaf or hard-of-hearing inmates incarcerated at the time of the onsite portion of the audit. During the onsite visit, there were three Limited English-speaking inmates incarcerated in the John I. Easley Criminal Justice Center. The PREA Coordinator advised during this audit cycle there were multiple times the Language Line Services were utilized. An invoice for Propio Language services was provided to the auditor confirming the usage of the services provided by Propio. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 1496 544 1536">Auditor Discussion</p> <p data-bbox="256 1648 544 1688">Evidence Reviewed:</p> <ul style="list-style-type: none"> <li data-bbox="256 1794 485 1834">A. Documents <ul style="list-style-type: none"> <li data-bbox="256 1865 1366 1906">1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files <li data-bbox="256 1937 959 1977">2. PREA Compliance Audit Instrument Checklist <li data-bbox="256 2009 1302 2049">3. Williamson County Sheriff's Office General Order 10.6.002, pages 5-6

4. Background Checks (10)
5. Self-Declaration Forms (10)
6. PREA Questionnaire for Prior Institutional Employers Form (1)
7. Application

B. Interviews

1. Human Resource Staff
2. PREA Coordinator
3. Background Investigator

The following delineates the audit findings regarding this standard:

115.17 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 5, John I. Easley Criminal Justice Center does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer 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, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The agency ensures the completion of a PREA Self-Declaration type form on all applicants as well as a background check completed by the Williamson County Sheriff's Office on all new applicants confirming compliance; the agency's application has a specific section for Self-Declaration. A review of ten human resource files confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Williamson County Sheriff's Office General Order 10.6.002 page 5, the Williamson County Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer, who may have contact with inmates. An interview with the Human Resources staff confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-John I. Easley Criminal Justice Center requires criminal background records checks to be completed before hiring any new employee. The agency has hired twenty-seven persons who may have had contact with offenders in the past twelve months. An interview with the Background Investigator corroborates compliance. The auditor reviewed spreadsheets from multiple years showing each stage of the employment process, including the completion of each background check. A review of ten human resource files also confirmed this practice. The background check includes:

- NCIC Check
- Fingerprint submission
- Thorough Background Investigation (prior employer check, military service, education history, civil litigation, etc.)
- Polygraph Examination
- Drug Test
- Psychological Examination

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 John I. Easley Criminal Justice Center makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. This request is documented in the appropriate Human Resource File. The auditor reviewed two such requests. The Background Investigator documents any findings from prior institutional employers on the executive summary report for each applicant. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) According to Williamson County Sheriff's Office General Order 10.6.002 page 5, John I. Easley Criminal Justice Center requires a criminal background records check (local checks) be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. A review of two volunteer files and three contractor files confirmed compliance. The Background Investigator corroborated this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) According to Williamson County Sheriff's Office General Order 10.6.002, John I. Easley Criminal Justice Center conducts criminal background records checks on

a constant basis by utilization of NCIC's Rap Back Program of current employees and contractors who may have contact with inmates. This program alerts the Sheriff any time fingerprints are submitted for criminal charges on anyone who is a current employee, applicant, volunteer, and/or contractor. The agency has not received any notifications from RAP Back Program in the past twelve months. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Williamson County Sheriff's Office General Order 10.6.002 page 6, mandates that all employees have a continuing affirmative duty to disclose any sexual misconduct as required by this standard. The Williamson County Sheriff's Office Statement of Prior Conduct Form" is completed by all applicants, upon being hired and if being considered for a promotion. The form has a specific checkbox for "promotions". Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Williamson County Sheriff's Office General Order 10.6.002 page 6 mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. During the past twelve months, there was no incident that was applicable to this section of the standard. An interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (h) Williamson County Sheriff's Office General Order 10.6.002 requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. An interview with the PREA Coordinator reiterated this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
 2. PREA Compliance Audit Instrument Checklist
- B. Interviews
1. PREA Coordinator
 2. Jail Administrator
- C. Other
1. Observation during Site Review

The following delineates the audit findings regarding this standard:

115.18 (a) Williamson County Sheriff's Office General Order 10.6.002 requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. During this audit cycle, there have been no significant expansions or modifications to this facility; however, the Sheriff has added several cameras in the facility to help promote sexual safety in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18 (b) John I. Easley Criminal Justice Center requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. This was reaffirmed during an interview with the Jail Administrator and PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. During this audit cycle, there have been no significant additions to the video technology at this facility. Staff as well as inmates confirmed during interviews they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 17 and 18
4. Memorandum of Understanding with Brentwood Police Department (07-24-20)
5. Memorandum of Understanding with the Sexual Assault Center of Nashville (07-02-20)

B. Interviews

1. PREA Coordinator
2. Medical Staff Members (2)
3. Random Staff

The delineates the audit findings regarding this standard:

115.21 (a) and (b) John I. Easley Criminal Justice Center complies with all elements of this standard. Williamson County Sheriff's Office General Order 10.6.002 pages 17 and 18, states the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. The Williamson County Sheriff's Office investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the 21st Judicial District Prosecutor and the Williamson County Sheriff's Office Investigator on each case. An interview with the PREA Coordinator confirms this practice. The auditor reviewed the uniform evidence protocol for evidence that there is sufficient technical detail to aid responders in obtaining usable physical evidence. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (c) John I. Easley Criminal Justice Center offers all victims of sexual abuse access to forensic medical examinations at the Williamson County Medical Center without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. During the past twelve months, there has not been an incident where this service was needed. This was confirmed during interviews with the PREA Coordinator and the Medical Staff Members.

	<p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.21 (d) The John I. Easley Criminal Justice Center has documented efforts to into a Memorandum of Understanding with the Sexual Assault Center of Nashville which agrees to provide outside victim advocacy services to the inmates. An information flyer for the Sexual Assault Center of Nashville is available on the kiosk both in English and Spanish. The services of these victim advocates have not been requested or used by the inmates during this audit cycle. A review of the Memorandum of Understanding confirms this agreement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.21 (e) John I. Easley Criminal Justice Center has entered into a Memorandum of Understanding with the Sexual Assault Center of Nashville which agrees to provide outside victim advocacy services to the inmates upon request. The facility also makes available to the victim a qualified agency staff member, upon request by the victim, who will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals as warranted. During the past twelve months, there has not been an incident where this service was needed. An information flyer for the Sexual Assault Center of Nashville is available on the kiosk both in English and Spanish. Williamson County Sheriff's Office General Order 10.6.002 page 18, and interview with the PREA Coordinator confirms this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.21 (f) The Williamson County Sheriff's Office is responsible for administrative and criminal investigations with the cooperation of the 21st Judicial District Attorney General's Office covering all aspects of this standard. Interviews with random staff and the PREA Coordinator corroborate Williamson County Sheriff's Office General Order 10.6.002. Therefore, this part of the standard is not applicable to this facility.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 17-18

B. Interviews

1. PREA Coordinator
2. PREA Investigator

C. Other

1. Auditor Observation

The following delineates the audit findings regarding this standard:

115.22 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 17, the John I. Easley Criminal Justice Center is required to investigate all PREA complaints received at this facility. All potential criminal activity is referred to the PREA Investigator assigned to the John I. Easley Criminal Justice Center for the Williamson County Sheriff's Office. The PREA Coordinator confirmed, there were three allegations of sexual abuse, and ten allegations of sexual harassment were referred and investigated during this audit cycle. All three allegations of sexual abuse were determined to be unfounded. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (b) All PREA allegations are investigated by the Williamson County Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the PREA Investigator of the Williamson County Sheriff's Office for criminal investigation and prosecution as warranted. The following information is posted on the agency's website:

PREA

The Prison Rape Elimination Act (PREA), 42 U.S.C. § 15601, et seq., is federal legislation aimed at eliminating sexual abuse and sexual harassment in confinement settings. In accordance with PREA, the Williamson County Sheriff's Office (WCSO) has a zero-tolerance policy toward all forms of sexual abuse and sexual harassment. Third parties may report allegations of sexual abuse and sexual harassment occurring in WCSO facilities to the WCSO in writing, by telephone, or in person. Such allegations should be directed to: PREA Coordinator, 408 Century Court, Franklin, TN 37064, telephone: (615) 790-5560. The WCSO shall ensure that an administrative and/or

criminal investigation is completed for allegations of sexual abuse or sexual harassment. Allegations of sexual abuse or sexual harassment will be referred for investigation to the Criminal Investigation Division of the WCSO, unless the allegation does not involve potentially criminal behavior.

Interviews with the PREA Coordinator and the PREA Investigator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (c) The John I. Easley Criminal Justice Center refers all criminal allegations for investigation to the designated PREA Investigator of the Williamson County Sheriff's Office. The requirements of this part of the standard are outlined in the General Order that is posted in the facility's lobby. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 Employee training	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents
	1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
	2. PREA Compliance Audit Instrument Checklist
	3. Williamson County Sheriff's Office General Order 10.6.002, page 7
	4. Employee Training Files (10)
	5. PowerDMS Training Acknowledgment (10)
	6. Printout of Staff Training Roster
	7. PREA Employee Training PowerPoint (43 slides)
	B. Interviews
	1. Random Staff

2. Training Instructor

C. Other

1. Auditor Observation

The following delineates the audit findings regarding this standard:

115.31 (a) John I. Easley Criminal Justice Center train all their employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

A review of the training curriculum and training sign-in sheets confirms this process. The class consists of forty-three PowerPoint slides; entitled "Prison Rape Elimination Act (PREA) Employee Training. The auditor viewed a training session for two new employees; the training was thorough and the new employees were able to ask questions and make comments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (b) The training is tailored to both the male and female gender of the inmates

at John I. Easley Criminal Justice Center. A review of the training curriculum and training material corroborates this practice. Ten out of ten training employee training files reviewed confirmed this practice. Training records are maintained in PowerDMS. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receives annual refresher PREA training during in-service according to Williamson County Sheriff's Office General Order 10.6.002 page 7, which meets the requirements of this standard. Refresher training and a test are completed on PowerDMS. The Auditor was provided with a staff training printout, showing all current eligible staff had received annual refresher training. Training records are stored in the Tennessee Corrections Institute Portal. Therefore, the facility meets this part of the standard during this audit.

115.31 (d) Williamson County Sheriff's Office General Order 10.6.002 page 7, mandates that the John I. Easley Criminal Justice Center documents, through employee electronic verification a statement of understanding training that all employees understand the training they have received. Training records are stored in the Tennessee Corrections Institute Portal. Ten out of ten training files reviewed confirmed this practice. Ten out of ten employees interviewed, stated they had received PREA training the first week of employment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents
	1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
	2. PREA Compliance Audit Instrument Checklist

3. Williamson County Sheriff's Office General Order 10.6.002 page 7
4. Training Files (3)
5. Acknowledgement Training Form (3)
6. PREA Employee Training PowerPoint (43 slides)

B. Interviews

1. Volunteers
2. Contractors

The following delineates the audit findings regarding this standard:

115.32 (a) Williamson County Sheriff's Office General Order 10.6.002 page 7 requires John I. Easley Criminal Justice Center to illustrate that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under John I. Easley Criminal Justice Center's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Interviews with two volunteers and three contractors confirmed they received and understood PREA training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (b) The level and type of training provided to volunteers and contractors is based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of John I. Easley Criminal Justice Center's zero-tolerance policy regarding sexual abuse and sexual harassment and their requirements to report such incidents. Volunteers and contractors were well-versed in First Responder duties. During the past twelve months, there were no volunteers or contractors who acted as First Responders to a sexual abuse incident. A review of training files and curriculum confirms this practice. Interviews with two volunteers and three contract employees confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (c) John I. Easley Criminal Justice Center documents through signature on the Volunteer/Contractor PREA Training Acknowledgement Form that volunteers and contractors understand the training they have received. A review of three contract employees and two volunteers' training records confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Inmate Education Form
4. Williamson County Sheriff's Office General Order 10.6.002 page 8
5. Inmate Training Records (10)
6. PREA Training Acknowledgement Forms (10)
7. Propio Language Line Invoice

B. Interviews

1. Intake Staff
2. Random Inmates

C. Other

1. PREA Video
2. Purple Video Relay System
3. LEP Training Material
4. Language Line Documentation
5. Auditor Observations

The following delineates the audit findings regarding this standard:

115.33 (a) Williamson County Sheriff's Office General Order 10.6.002 page 8, states that during the intake process, inmates receive information explaining John I. Easley Criminal Justice Center's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual

harassment both internally and externally. The information is on the Inmate Education form and is part of their intake packet. This process was corroborated during interviews with Intake Staff; as well as ten out of ten random inmates. The auditor successfully tested the following:

- How the facility provides the necessary PREA information to all confined persons, regardless of ability and language, including whether:
 - Written information, if applicable, is clear and provided at an appropriate reading level and is accessible for all persons confined in the facility, including those who are limited English proficient (LEP)
 - The facility provides Propio Language interpreters when needed, to assist Deaf and non-English speaking persons confined in the.
 - Staff are prepared to read written information out loud, if applicable, to make accommodations for persons confined in the facility when necessary (e.g., Blind or have low vision, limited reading skills).
 - Mental health staff or other skilled educators/staff are involved in providing the required information to confined persons with cognitive or functional disabilities.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (b) Williamson County Sheriff's Office General Order 10.6.002 page 8, states that within 30 days of intake, John I. Easley Criminal Justice Center provides a comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. A review of ten inmate records showed that the PREA Coordinator completes reassessments within 30 days of incarceration. The PREA video is played daily in each housing unit and logged in the JMS. Examples of the JMS logs were provided to the auditor. All twenty-six inmates interviewed stated the video is played every day. During the site review, the auditor:

- Determined comprehensive education is provided via video. (Just Detention International PREA video).
- Assessed whether the education provided includes the required information as outlined in the standards.
- Assessed how the facility makes comprehensive education accessible to all persons confined in the facility. (Played every day in every housing unit)

Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.33 (c) During interviews with random inmates, John I. Easley Criminal Justice Center has provided such education within one year of the effective date of the PREA standards to all its inmates, Williamson County operates one facility; therefore, there are no inter-agency facility transfers. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) John I. Easley Criminal Justice Center provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with Language Line Services; as well as a Purple Video Relay system to assist inmates with these disabilities. A functionality test was successfully performed on the Purple Video Relay system was tested by the PREA Coordinator on 07/27/23. The facility will assign staff as needed to ensure comprehension is achieved by inmates with disabilities. There were three LEP inmates housed in the John I. Easley Criminal Justice Center during the onsite visit. Two of the three LEP inmates remembered being screened and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure, and a file review showed he did in fact receive a PREA screening upon intake. There were no deaf/hearing impaired inmates, one visually impaired, two cognitive inmates, and one with a physical impairment at the time of the onsite portion of the audit. Excluding the one LEP inmate, all other targeted inmates interviewed displayed a clear knowledge of the agency's zero-tolerance policy and how to report sexual abuse and/or sexual harassment allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was documentation provided of inmates' participation in PREA educational sessions as required by this part of the standard. Interviews with twenty-six random inmates and a review of intake files confirmed this practice. The inmate stated the PREA video is played on the televisions daily. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) John I. Easley Criminal Justice Center does provide the inmates with posters in inmate-accessible areas, flyers on the kiosk, and an inmate handbook outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The information provided is in both English and Spanish. There were three LEP inmates housed in the John I. Easley Criminal Justice Center during the onsite visit. Two of the three LEP inmates remembered being screened and receiving PREA information upon intake. The third LEP inmate was given a Spanish PREA brochure, and a file review showed he did in fact receive a PREA screening upon intake. All twenty-six inmates interviewed stated the PREA video is played every day in their respective housing units. These documents are available in both English and Spanish. During the onsite visit the auditor:

	<ul style="list-style-type: none"> - Observed signage throughout the facility was easily read/accessed by persons in the facility, specifically: <ul style="list-style-type: none"> - Signage language was clear and easy to understand. - Flyers specific to services, such as emotional support services, civil immigration, and external reporting. - Signage was provided in English and Spanish. - The signage text size, formatting, and physical placement accommodated most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc. <ul style="list-style-type: none"> · The information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage. · The information on the signage was accurate and consistent throughout the facility <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed: <ul style="list-style-type: none"> A. Documents <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Investigator Training Records 4. Williamson County Sheriff’s Office General Order 10.6.000 page 20 5. PREA Training Acknowledgement B. Interviews <ol style="list-style-type: none"> 1. Investigators

The following delineates the audit findings regarding this standard:

115.34 (a) In addition to the general PREA training provided to all employees, John I. Easley Criminal Justice Center ensures that the investigators have received training in conducting investigations in confinement settings. The PREA Investigator completed the National Institute of Corrections course on "Investigating Sexual Assaults in a Confinement Setting". A review of the PREA Investigator's training file confirmed this practice. Williamson County Sheriff's Office General Order 10.6.000 page 20 notates this practice. While reviewing the training records, the auditor did review the training document signed by the investigator, Employee PREA Training Acknowledgment Form as required in 115.31. Additionally, the agency's PREA criminal investigator has twenty-seven years of law enforcement experience and has completed training regarding the investigation of these offenses, including Child Abuse Investigations, Forensic Interviewing of Children, Protecting Children Online, Confronting the Challenge of Sexual Exploitation, Internet Investigation and Preserving Computer Evidence, Basic Internet Crimes Investigation, Intermediate and Advanced Internet Crimes Against Children, Investigating Claims of Sexual Harassment, Interview and Interrogation, and many others. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The PREA Investigator completed the National Institute of Corrections course on "Investigating Sexual Assaults in a Confinement Setting". Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (c) John I. Easley Criminal Justice Center maintains documentation that the PREA Investigator has completed the required specialized training in conducting sexual abuse investigations. A review of the training curriculum and training file confirms compliance. The auditor found the facility PREA Investigator to be very knowledgeable in the PREA Standards pertaining to evidence collection, investigation, and inmate rights. Additionally, the agency's PREA criminal investigator has twenty-seven years of law enforcement experience and has completed training regarding the investigation of these offenses, including Child Abuse Investigations, Forensic Interviewing of Children, Protecting Children Online, Confronting the Challenge of Sexual Exploitation, Internet Investigation and Preserving Computer Evidence, Basic Internet Crimes Investigation, Intermediate and Advanced Internet Crimes Against Children, Investigating Claims of Sexual Harassment, Interview and Interrogation, and many others. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.23.001 4. Fast Access Medical Training Records 5. PREA Training Rosters B. Interviews <ul style="list-style-type: none"> 1. Medical Staff 2. PREA Coordinator <p>The following delineates the audit findings regarding this standard:</p> <p>115.35 (a) The PREA Specialized Medical/Mental curriculum provided, training file John I. Easley Criminal Justice Center review, and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.35 (b) The medical staff at this facility does not conduct forensic exams. Therefore, this part of the standard is not applicable to this facility.</p> <p>115.35 (c) John I. Easley Criminal Justice Center contracts with Fast Access Healthcare for medical and services. The agency maintains documentation that all medical and mental health practitioners have received specialized training. Specialized training</p>

	<p>consisted of the Fast Access Healthcare course for medical and mental health staff on dealing with sexual abuse incidents in a confinement setting. Training documentation provided confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.35 (d) Medical healthcare practitioners with Fast Access Healthcare also receive the annual training mandated for all employees, contractors, and volunteers. An interview with the Medical Staff and PREA Coordinator confirmed this training. Training documentation provided confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Intake Files 4. Williamson County Sheriff's Office General Order 10.6.002 page 9 5. Inmate Training Records (10) 6. Reassessment Documentation (10) <p>B. Interviews</p> <ol style="list-style-type: none"> 1. Random Inmates 2. Screening Staff <p>The following delineates the audit findings regarding this standard:</p> <p>115.41 (a) Williamson County Sheriff's Office General Order 10.6.002 page 9 states</p>

the John I. Easley Criminal Justice Center ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Williamson County Sheriff's Office only has one correctional facility; therefore, there are no inmate transfers. An interview with the Screening Staff confirms this practice. The auditor did determine:

- screening staff ask screening questions in a manner that fosters comfort and elicits responses.
- the screening process occurs in a setting that ensures as much privacy as possible given the potentially sensitive information that could be discussed
- Screening staff use an instrument to collect information during the risk screening process.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) The John I. Easley Criminal Justice Center provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. All screening reviewed appeared to properly be completed and within the prior time frame. Ten out of ten records reviewed showed 100% compliance. Random inmate interviews corroborate this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (c) Based on the documentation provided and inmate file reviews the facility utilizes an objective screening instrument that covers all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (d) The intake screening instrument used considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;

- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and
- (10) Whether the inmate is detained solely for civil immigration purposes.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to John I. Easley Criminal Justice Center, in assessing inmates for risk of being sexually abusive. A review of the screening tool confirms compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Within 30 days from the inmate's arrival, the John I. Easley Criminal Justice Center PREA Coordinator will reassess each inmate's risk of victimization or abusiveness based upon any additional, relevant information received by John I. Easley Criminal Justice Center since the intake screening. The reassessments reviewed did not include input from the inmates being reassessed. The PREA Coordinator advised the agency has completed 767 reassessments within the past twelve months.

Corrective Action:

The reassessment must consider input from each inmate. The PREA Coordinator and Operations Captain will determine and implement a new process capturing input from each inmate being reassessed. The administration and auditor agreed upon a general timeline to implement the new process, ensuring the new reassessments are institutionalized in the facility.

Response to Corrective Action:

The agency re-established a 30-day reassessment process that captures the input of each inmate. The reassessment includes questions specific to the inmate's perception of vulnerability and history of victimization. The PREA Coordinator provided the auditor with thirty randomly selected reassessments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (g) John I. Easley Criminal Justice Center will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. In the past twelve months, John I. Easley Criminal Justice Center has not had a PREA incident or received any additional information that would trigger a rescreening. This practice was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (h) General Order 10.6.002 page 9, states John I. Easley Criminal Justice Center does not discipline inmates for refusing to answer screening questions or not disclosing complete information. Interviews with the PREA Coordinator and ten random inmates confirmed compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (i) John I. Easley Criminal Justice Center implements appropriate controls on the dissemination 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. Screenings are considered confidential and are secured in the agency's jail management system. Based on policy review, interview with the PREA Coordinator, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work, and program assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents
	1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
	2. PREA Compliance Audit Instrument Checklist
	3. Williamson County Sheriff's Office General Order 10.6.002 page 10

4. Transgender Housing Documentation

B. Interviews

1. Screening Staff

2. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.42 (a) Williamson County Sheriff's Office General Order 10.6.002 page 10, details John I. Easley Criminal Justice Center's uses information from the risk screening to decide 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. During the site review, the auditor randomly reviewed housing and programming for screened inmates; all housing and programming reviewed were found appropriate. The PREA Coordinator reviews all initial PREA assessments and has the authority to override the results when warranted. Results from the initial PREA screening are placed in the Jail Management System. The agency's JMS allows staff to print reports for inmates who are at risk of victimization and for inmates who are at risk of abuse. Staff assigning housing placement are required to review each inmate's PREA status prior to cell movements. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) John I. Easley Criminal Justice Center makes individualized determinations about how to ensure the safety of each inmate. This was corroborated during an interview with the PREA Coordinator and Screening Staff. Results from the initial PREA screening are placed in the Jail Management System. The agency's JMS allows staff to print reports for inmates who are at risk of victimization and for inmates who are at risk of abuse. Staff assigning housing placement are required to review each inmate's PREA status prior to cell movements. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) John I. Easley Criminal Justice Center outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on a case-by-case basis as required by this standard. At the time of the audit, John I. Easley Criminal Justice Center did have one transgender inmate. There were no transgender or intersex inmates housed in the facility during the onsite portion of the

audit. Based on interviews with the LGBTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. A PREA Housing and Programs Review Form is completed for all transgender inmates by members of the Sexual Assault Response Team. SART is made up of members of the Operations Captain, Medical, PREA Coordinator, and PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) John I. Easley Criminal Justice Center outlines the procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. John I. Easley Criminal Justice Center General Order 10.6.002 page 10 and interview with the PREA Coordinator confirmed this procedure. There were no transgender or intersex inmates housed in the facility for the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (e) John I. Easley Criminal Justice Center requires that transgender and intersex inmates' own views regarding their own safety be given serious consideration. There were no transgender/ intersex inmates housed in the facility for the past twelve months. Based on interviews with the LGBTI inmates housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (f) John I. Easley Criminal Justice Center requires that transgender and intersex inmates be given the opportunity to shower separately from other inmates. There were no transgender inmates housed in the facility during the onsite visit. A transgender inmate would be allowed to come out and shower alone; this practice would be documented in the appropriate JMS log. This process was confirmed with the PREA Coordinator. Showers at this facility are covered which allows all inmates privacy. The decision for housing and program placement for a transgender inmate is documented. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (g) John I. Easley Criminal Justice Center does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. There were no transgender/ intersex inmates housed in the facility for the past twelve months. The

	<p>auditor’s observation during the site review corroborated this procedure; inmates were not found to be placed in any particular housing unit in the facility based on LGBTI-related information. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 page 10 B. Interviews <ul style="list-style-type: none"> 1. PREA Coordinator 2. Segregated Housing Staff 3. Random Inmates C. Other <ul style="list-style-type: none"> 1. Auditor Observation <p>The following delineates the audit findings regarding this standard:</p> <p>115.43 (a) Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. The Williamson County Sheriff’s Office General Order 10.6.002 page 10 outlines the procedures to ensure compliance with</p>

this standard. Segregation Staff and inmate interviews revealed no incidents of involuntary segregation for up to 24 hours. The auditor’s interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (b) Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If John I. Easley Criminal Justice Center restricts access to programs, privileges, education, or work opportunities, John I. Easley Criminal Justice Center documents the opportunities that have been limited, the duration of the limitation, and the reasons for such limitations. Segregation Staff and inmate interviews revealed no incidents of involuntary segregated housing being used for more than 24 hours for this purpose during the past twelve months at this facility; therefore, there were no 30-day administrative segregation reviews. Segregated Housing Staff interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. The auditor did not interview anyone who stated they had been placed in involuntary segregation for this purpose. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (c) Williamson County Sheriff’s Office General Order 10.6.002 page 10 details the John I. Easley Criminal Justice Center assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. Staff and inmate interviews revealed no incidents of involuntary segregated housing for more than 24 hours being used for this purpose during the past twelve months at this facility; therefore, there were no 30-day reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents
	1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files
	2. PREA Compliance Audit Instrument Checklist
	3. Williamson County Sheriff’s Office General Order 10.6.002 pages 11-13 (Updated 08-21-23)
	4. Memorandum of Understanding with the Brentwood Police Department

B. Interviews

1. PREA Coordinator
2. Random Staff
3. Random Inmates

C. Other

1. Posters/Handouts
2. Observation During Site Review

The following delineates the audit findings regarding this standard:

115.51 (a) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12, states the John I. Easley Criminal Justice Center provides multiple internal ways for inmates to report incidents of abuse or harassment. They can report verbally, in writing, by dialing the hotline provided and/or through report of a third party. An internal hotline will notify multiple members of the SART team. Interviews with random staff and inmates corroborate this process. Ways to report include:

- Verbally or in writing to any WCSO Staff
- Through the emergency grievance process
- By dialing 615-721-3050
- Contact relevant consular officials
- Notifying a 3rd Party

During the onsite review, the auditor did observe:

- signage throughout the facility can be easily read/accessed by persons in the facility
- signage is provided in English and Spanish
- signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair
- the information on the signage is accurate and consistent throughout the facility

- signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided.
- how mail moves from confined persons to the mailroom.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (b) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12, states the John I. Easley Criminal Justice Center provides at least one way for inmates to report abuse or harassment to a public or private entity or Office that is not part of John I. Easley Criminal Justice Center, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The external hotline number is answered by the Brentwood Police Department Dispatch, satisfying the requirements of this standard. The external reporting hotline was tested during the site review. During the past twelve months, John I. Easley Criminal Justice Center has not housed an inmate solely for immigration status; provision would be made for the detainee to contact his/her consular.

During the onsite review, the auditor did observe:

- signage throughout the facility can be easily read/accessed by persons in the facility
- signage is provided in English and Spanish
- signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair
- the information on the signage is accurate and consistent throughout the facility
- signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 12 requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. During the past twelve months, no reports were made anonymously, and one report was made by a third party. All allegations shall be promptly documented in an incident report and reported to the supervisor. Interviews with Random Staff confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	<p>115.51 (d) John I. Easley Criminal Justice Center staff may privately report sexual abuse and sexual harassment to the Jail Administrator, a supervisor, PREA Coordinator, or the PREA external telephone number. Interviews with Random Staff confirmed this practice. During the past twelve months, no reports were made anonymously and one by a third party. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 pages 11 and 13 (Updated 08/21/23) B. Interviews <ul style="list-style-type: none"> 1. PREA Coordinator 2. Random Staff 3. Random Inmates C. Other <ul style="list-style-type: none"> 1. Auditor's Observation of the Grievance Process <p>115.52 (a) According to Williamson County Sheriff's Office General Order 10.6.002 page 11, the agency investigates any report of sexual abuse and takes appropriate</p>

actions whether or not such information is received in the form of a grievance.

During the past twelve months, John I. Easley Criminal Justice Center has not received a grievance concerning sexual abuse. An interview with the PREA Coordinator confirms this process. The agency is in compliance with this section of the standard.

115.52 (b) The Williamson County Sheriff's Office does not impose a time limit on when offenders/detainees may submit a grievance regarding an allegation of sexual abuse. An interview with the PREA Coordinator confirms this practice. Therefore, the agency complies with this section of the standard.

115.52 (c) Williamson County Sheriff's Office General Order 10.6.002 page 12 states the agency will ensure that an offender/detainee alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past twelve months, John I. Easley Criminal Justice Center has not received a grievance concerning sexual abuse. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint. Therefore, the agency is in compliance.

115.52 (d) According to Williamson County Sheriff's Office General Order 10.6.002 page 12, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require it, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for the reply, including any properly noticed extension, the offenders/detainee's complainant may consider the absence of a response to be a denial at this level. During the past twelve months, John I. Easley Criminal Justice Center has not received a grievance concerning sexual abuse. Interview with the PREA Coordinator reiterates this process; therefore, the agency is found to be in compliance with the section of the standard.

115.52 (e) Williamson County Sheriff's Office General Order 10.6.002 page 12 states third parties including fellow offenders/detainees, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the offender/detainee declines to have the request processed on his or her behalf, the agency shall document the offender/detainee's decision. During the past twelve months, John I. Easley Criminal Justice Center has not received a grievance concerning sexual abuse. The PREA Coordinator confirmed this process. Therefore,

	<p>the agency compiles with this section of the standard.</p> <p>115.52 (f) The Williamson County Sheriff’s Office General Order 10.6.002 states when an offender/detainee is subject to a substantial risk of imminent threat of sexual abuse, the offender/detainee may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency’s immediate focus must be to take action to prevent potential sexual abuse. Corrective and protective action must be pursued promptly. Williamson County Sheriff’s Office General Order 10.6.002 page 12 mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain of command to ensure prompt action is taken. During the past twelve months, John I. Easley Criminal Justice Center has not received a grievance concerning sexual abuse. An interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.</p>
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115.53	Inmate access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 PREA page 11 4. Memorandum of Understanding with the Sexual Assault Center of Nashville 5. Speak Up Poster B. Interviews <ul style="list-style-type: none"> 1. PREA Coordinator

2. Random Staff
3. Random Inmates

The following delineates the audit findings regarding this standard:

115.53 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 11 details the agency's commitment to compliance. The agency has entered into a Memorandum of Understanding with the Sexual Assault Center of Nashville which has agreed and is currently providing confidential outside victim advocacy services to the inmates at John I. Easley Criminal Justice Center. The mailing address and telephone number for this agency are made available to all inmates at the facility. John I. Easley Criminal Justice Center enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

Williamson County does not house inmates solely for immigration purposes. Immigration (ICE) does place holds on inmates with local charges; once the local charge(s) is released - Immigration has 48 hours to pick up the detainee. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. The auditor observed "Speak Up" posters throughout the facility; the posters not only had reporting procedures but included a summation of Victim Support Services with contact number and address. Information is also listed on the "Speak Up" brochure that each inmate receives during the intake process. At the time of the onsite visit, John I. Easley Criminal Justice Center did not have any detainees housed for immigration. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (b) John I. Easley Criminal Justice Center informs 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. The PREA Coordinator confirmed all calls to Brentwood Police Department Dispatch are free and not recorded. The auditor did test the phone system while onsite. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (c) Williamson County Sheriff's Office utilizes the Brentwood Police Department Dispatch for external reporting; the agency currently provides emotional support services to victims of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.54	Third-party reporting
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 300">Auditor Discussion</p> <hr/> <p data-bbox="256 340 544 376">Evidence Reviewed:</p> <p data-bbox="256 483 485 519">A. Documents</p> <ol data-bbox="256 555 1458 918" style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 PREA page 11 4. Agency Website Williamson County Sheriff Williamson County, TN - Official Site (williamsoncounty-tn.gov) 5. End the Silence Brochure (PRC Format) <p data-bbox="256 1025 472 1061">B. Interviews</p> <ol data-bbox="256 1097 572 1133" style="list-style-type: none"> 1. PREA Coordinator <p data-bbox="256 1240 416 1276">C. Other</p> <ol data-bbox="256 1312 616 1348" style="list-style-type: none"> 1. Auditor Observation <p data-bbox="256 1456 1477 1953">115.54 (a) The Williamson County Sheriff’s Office General Order 10.6.002 page 11, details the agency’s commitment to compliance. The agency provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment; to include, call the Sexual Assault Center of Nashville, and tell friends and family members who may call the jail or mail a letter to report sexual abuse. Third-Party Reporting procedures are posted in the lobby of the jail. Inmates are advised of third-party reporting on “Speak Up” posters that are throughout the facility. The information available in the lobby explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. During the past twelve months, Williamson County has received one third-party reports of sexual abuse. During the site review, the auditor observed:</p> <p data-bbox="256 1989 1441 2024">- signage throughout the facility was easily read/accessed by persons in the facility</p>

	<ul style="list-style-type: none"> - signage language was clear and easy to understand - signage is provided in English and Spanish - signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair - the information on the signage was accurate and consistent throughout the facility - signage was placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. - signage information provided by the signage was not obscured, unreadable by graffiti, or missing due to damage <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 18-20 B. Interviews <ul style="list-style-type: none"> 1. PREA Coordinator 2. Medical Staff (2)

The following delineates the audit findings regarding this standard:

115.61 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 18 requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Williamson County Jail; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (b) John I. Easley Criminal Justice Center requires apart from reporting to designated supervisors or officials, staff does not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency General Order 10.6.002 to make treatment, investigation, and other security and management decisions. Interviews with random staff confirmed that staff had received and understood their reporting responsibilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (c) John I. Easley Criminal Justice Center requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. During the past twelve months, there has not been an incident requiring medical or mental health practitioners to complete this procedure. This was confirmed during interviews with Sexual Assault Center of Nashville Services staff and with the contracted Medical Staff Member. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, John I. Easley Criminal Justice Center reports the allegation to the designated state or local services agency. During interviews with both the medical staff and PREA Coordinator, all understood that the Office of Children Services would need to be contacted if the alleged victim was under the age of 18. During the past twelve months, John I. Easley Criminal Justice Center has not housed anyone under the age of 18 or anyone considered a vulnerable adult. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (e) John I. Easley Criminal Justice Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the PREA Investigator as required. During the past twelve months, John I. Easley Criminal

	Justice Center has not received an anonymous or third-party report of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.
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115.62	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 page 4 <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Random Staff (12) <p>The following delineates the audit findings regarding this standard:</p> <p>115.62 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 4 details the agency's commitment to compliance. Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the John I. Easley Criminal Justice Center is subject to a substantial risk of imminent sexual abuse. Interviews with the PREA Coordinator and twelve out of twelve random staff corroborated this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p>

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's General Order 10.6.002 page 13
4. Notification Form

B. Interviews

1. PREA Investigator

The following delineates the audit findings regarding this standard:

115.63 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 13 details the agency's commitment to compliance. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of John I. Easley Criminal Justice Center that received the allegation notified the head of the facility or appropriate Office where the alleged abuse occurred. This process is documented on the agency's memorandum form, Williamson County Sheriff's Office Notification of Alleged Abuse. According to the PREA Coordinator, during the past twelve months, Williamson County has made one notification to another agency pertaining to sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented by the PREA Investigator. During the past twelve months, Williamson County has made one notification to another agency pertaining to sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (d) Upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Williamson County Jail. According to the PREA Coordinator, during the past twelve months, Williamson County has not received a notification to another agency pertaining to sexual abuse. If received, the allegation is referred immediately to the PREA Investigator to be investigated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 18
4. First Responder Cards

B. Interviews

1. PREA Coordinator
2. Random Staff

The following delineates the audit findings regarding this standard:

115.64 (a) Williamson County Sheriff's Office General Order 10.6.002 page 18 details the agency's commitment to compliance; the policy outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and
- (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	<p>Each employee is required to keep a First Responder Card on their person at all times. Therefore, the facility exceeds compliance with this part of the standard during this audit.</p> <p>115.64 (b) Williamson County Sheriff's Office General Order 10.6.002 page 18 mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with random staff and training records of non-security staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 pages 18-20 <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Shift Supervisors (2) 3. SART Members (2) <p>The following delineates the audit findings regarding this standard:</p> <p>115.65 (a) John I. Easley Criminal Justice Center has a comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. The plan clearly defines the roles and responsibilities of each person</p>

	<p>involved and the procedures to be followed in detail. Roles addressed include the First Responder, Shift Supervisor, PREA Coordinator, and PREA investigator. Interviews with SART members and shift supervisors confirmed their knowledge of the response plan.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator <p>The following delineates the audit findings regarding this standard:</p> <p>115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Williamson County Sheriff’s Office General Order 10.6.002 on sexual abuse and sexual harassment. The PREA Coordinator confirmed that the Williamson County Sheriff’s Office has not entered into any collective bargaining agreements during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

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

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 19 and 20
4. Retaliation Form

B. Interviews

1. PREA Coordinator (also the Retaliation Monitor)

The following delineates the audit findings regarding this standard:

115.67 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 19 details the agency's commitment to compliance. John I. Easley Criminal Justice Center has 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 and designates which staff members or Offices are charged with monitoring retaliation. John I. Easley Criminal Justice Center has a retaliation form for inmates who report sexual abuse and a separate form for staff who report sexual abuse. The PREA Coordinator is also the Retaliation Monitor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (b) John I. Easley Criminal Justice Center has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The PREA Coordinator is also the Retaliation Monitor. The Inmate Retaliation Form has detailed information for all relevant notifications if needed. John I. Easley Criminal Justice Center has not had a substantiated or unsubstantiated PREA finding of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 20,

states for at least 90 days following a report of sexual abuse, John I. Easley Criminal Justice Center monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There are periodic status checks performed and documented. John I. Easley Criminal Justice Center monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. The PREA Coordinator is also the Retaliation Monitor. The Inmate Retaliation Form has detailed information for all relevant notifications if needed. John I. Easley Criminal Justice Center has not had a substantiated or unsubstantiated PREA finding of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (d) If any other individual who cooperates with an investigation expresses a fear of retaliation, John I. Easley Criminal Justice Center takes appropriate measures to protect that individual against retaliation. The Inmate Retaliation Form has detailed information for all relevant notifications if needed. John I. Easley Criminal Justice Center has not had a substantiated or unsubstantiated PREA finding of sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	<ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 page 20 B. Interviews <ul style="list-style-type: none"> 1. PREA Coordinator 2. Random Inmate Interviews (26)

	<p>3. Segregation Staff Interviews (2)</p> <p>The following delineates the audit findings regarding this standard:</p> <p>115.68 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 20, PREA details the agency's commitment to compliance with this standard. John I. Easley Criminal Justice Center prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the facility administration and segregation staff revealed that involuntary segregation has not been used for this purpose in the past twelve months; therefore, there were not any subsequent monitoring documentation. The PREA Coordinator stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. This was confirmed during random inmates and segregation staff interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 20-22 4. Investigation Files (6) <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Investigator

The following delineates the audit findings regarding this standard:

115.71 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 20 details the agency's commitment to compliance. John I. Easley Criminal Justice Center PREA Investigator conducts an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. There were thirteen PREA incidents reported in the past twelve months; therefore, there were six investigative files to review. General Order does mandate:

- i. An effort to determine whether staff actions or failures to act contributed to the abuse;
- ii. Investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (b) Based on training curriculums provided, investigators' training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency's PREA Investigator has training regarding the investigation of specialized PREA investigations, Critical Task and Liability, Leadership, and interrogation school. During an interview with the PREA investigator, the investigator displayed a clear working knowledge of the agency's policy for investigating sexual abuse and sexual harassment allegations and the PREA standards with regard to such investigations. John I. Easley Criminal Justice Center had thirteen PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Williamson County Sheriff's Office General Order 10.6.002 PREA pages 22 states that John I. Easley Criminal Justice Center PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; take photos of the alleged crime scene, review incident and shift reports, interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. The agency's PREA Investigator has training regarding the investigation of specialized PREA investigations, Critical Task and

Liability, Leadership, and interrogation school. During an interview with the PREA investigator, the investigator displayed a clear working knowledge of the agency's policy for investigating sexual abuse and sexual harassment allegations and the PREA standards with regard to such investigations. In the past twelve months, John I. Easley Criminal Justice Center has had thirteen total PREA investigations. The six investigation files reviewed showed that each investigation was thorough and followed the agency's guidelines for conducting PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) When the quality of evidence appears to support a criminal prosecution, John I. Easley Criminal Justice Center refers the case to the 21st Judicial District Attorney General's Office for prosecution. In the past twelve months, John I. Easley Criminal Justice Center has not had a referral to the District Attorney General's Office. All three sexual abuse allegations in the past twelve months were deemed to be unfounded by the investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as an inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. In the past twelve months, John I. Easley Criminal Justice Center had thirteen PREA investigations. In the past twelve months, John I. Easley Criminal Justice Center has not had a referral to the District Attorney General's Office. All three sexual abuse allegations in the past twelve months were deemed to be unfounded by the investigators. The six investigation files reviewed showed that each investigation was thorough and followed the agency's guidelines for conducting PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) John I. Easley Criminal Justice Center administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. In the past twelve months, John I. Easley Criminal Justice Center has had ten PREA investigations for sexual harassment and three for sexual abuse. During the site review, the auditor observed:

- the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards

- electronic safeguards of any information/documentation collected and maintained electronically pursuant to the PREA Standards

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (g) John I. Easley Criminal Justice Center criminal investigations are documented by the Williamson County Sheriff's Office PREA Investigator in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. In the past twelve months, John I. Easley Criminal Justice Center had thirteen total PREA investigations for sexual harassment and sexual harassment. The six investigation files reviewed showed that each investigation was thorough and followed the agency's guidelines for conducting PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) Williamson County Sheriff's Office General Order 10.6.002 PREA pages 22, states the John I. Easley Criminal Justice Center refers all allegations to the Williamson County Sheriff's Office PREA Investigator for investigation and prosecution when warranted. In the past twelve months, John I. Easley Criminal Justice Center had thirteen total PREA abuse investigations: there were ten sexual harassment allegations and three sexual abuse allegations. No investigations were referred to the 21st Judicial District Attorney's General's Office for prosecution; all three sexual abuse allegations were determined to be unfounded. The six investigation files reviewed showed that each investigation was thorough and followed the agency's guidelines for conducting PREA investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (i) John I. Easley Criminal Justice Center retains all written reports for as long as the alleged abuser is incarcerated or employed by John I. Easley Criminal Justice Center, plus five years. This was confirmed during communications with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (j) Williamson County Sheriff's Office General Order 10.6.002 PREA pages 23 states that the departure of the alleged abuser or victim from employment or control of the John I. Easley Criminal Justice Center or agency does not provide a basis for terminating an investigation. In the past twelve months, John I. Easley Criminal Justice Center had three PREA abuse investigations: all three investigation files were reviewed by the auditor. All three investigations were deemed to be unfounded. Therefore, the facility demonstrated compliance with this part of the standard during

	<p>this audit.</p> <p>115.71 (k) The Williamson County Sheriff’s Office PREA Investigator conducts criminal sexual abuse investigations pursuant to the requirements of this standard. The Williamson County Sheriff’s Office General Order 10.6.001 PREA page 20 outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.71 (l) John I. Easley Criminal Justice Center refers all criminal cases to the Williamson County Sheriff’s Office PREA Investigator. By policy, the facility remains informed of the progress of the investigation through communication between the Attorney General’s Office and the Williamson County Sheriff’s Office PREA Investigator assigned to handle the case. In the past twelve months, John I. Easley Criminal Justice Center had not had any investigations referred for prosecution. All three sexual abuse allegations were deemed to be unfounded. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 page 21 4. Investigation Files (6) <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. PREA Investigator

	<p>3. Random Inmates</p> <p>The following delineates the audit findings regarding this standard:</p> <p>115.72 John I. Easley Criminal Justice Center imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. All PREA allegations begin as potential criminal investigations; if no criminality occurred, the allegation will then be treated as a potential administrative investigation. In the past twelve months, John I. Easley Criminal Justice Center had thirteen PREA investigations. Six files were reviewed by the auditor; all six files were well-organized and thorough. Interviews with the PREA Investigator and the PREA Coordinator corroborated this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 22 4. Notifications <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator <p>The following delineates the audit findings regarding this standard:</p>

115.73 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 22 details the agency's commitment to compliance. Based on Williamson County's General Order it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates would be provided this notification. In the past twelve months, John I. Easley Criminal Justice Center has had thirteen investigations. The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency conducts its own PREA investigations. Therefore, the facility is exempt from this part of the standard during this audit.

115.73 (c) Based on John I. Easley Criminal Justice Center practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

(1) The staff member is no longer posted within the inmate's unit;

(2) The staff member is no longer employed at the facility;

(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse

within the John I. Easley Criminal Justice Center; or

(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse

within the John I. Easley Criminal Justice Center.

The documentation provided confirmed the inmates would be provided this notification. This was confirmed during file review, inmate interviews, and an interview with the PREA Coordinator who makes the notification. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Following an inmate’s allegation they had been sexually abused by another inmate, John I. Easley Criminal Justice Center subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility, or John I. Easley Criminal Justice Center learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates would be provided this notification. In the past twelve months, John I. Easley Criminal Justice Center has had thirteen PREA investigations. The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (e) All such notifications or attempted notifications are completed by the PREA Coordinator and are documented in the appropriate PREA investigation file. In the past twelve months, John I. Easley Criminal Justice Center has had thirteen PREA investigations. The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (f) Williamson County Sheriff’s Office General Order 10.6.002 PREA page 22, outlines the agency’s obligation to report under this standard terminates if the inmate is released from John I. Easley Criminal Justice Center’s custody. In the past twelve months, John I. Easley Criminal Justice Center has had thirteen PREA investigations. The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed:
	A. Documents
	1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files

- 2. PREA Compliance Audit Instrument Checklist
- 3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 14

B. Interviews

- 1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.76 The Williamson County Sheriff's Office General Order 10.6.002 PREA page 14 details the agency's commitment to compliance.

(a) and (b) Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. According to the PREA Coordinator, there no staff members terminated or disciplined for PREA violations within the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (c) Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. According to the PREA Coordinator, there no staff members terminated or disciplined for PREA violations within the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (d) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement unless the activity was clearly not criminal, and to any relevant licensing bodies. According to the PREA Coordinator, there no staff members terminated or disciplined for PREA violations within the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 page 15
4. Volunteer (2) and Contract Employee (3) training records

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.77 (a) The Williamson County Sheriff's Office General Order 10.6.002 PREA page 15 details the agency's commitment to compliance. Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and is reported to law enforcement unless the activity was clearly not criminal, and to relevant licensing bodies. According to the PREA Coordinator, during the past twelve months, there were no contractors or volunteers who were perpetrators in a substantiated PREA investigation. A review of two volunteers and three contracted employee training files, revealed both volunteers and contract employees complete a thorough PREA training course prior to having contact with offenders in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77 (b) John I. Easley Criminal Justice Center takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. According to the PREA Coordinator, during the past twelve months, there were no contractors or volunteers who were perpetrators in a substantiated PREA investigation. A review of two volunteers and three contracted employee training files, revealed both volunteers and contract employees complete a thorough PREA training course prior to having contact with offenders in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 PREA pages 14-15

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.78 (a) The Williamson County Sheriff's Office General Order 10.6.002 page 14, details the agency's commitment to compliance. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (b) Sanctions are 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. Sanctions are located in the agency's Inmate Handbook. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (c) The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. This would be done, when needed, by the contracted Mental Health Services Provider (Fast Access). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (d) Sexual Assault Center of Nashville staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, John I. Easley Criminal Justice Center does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (e) John I. Easley Criminal Justice Center disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. This was confirmed during an interview with the PREA Coordinator.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) Williamson County Sheriff’s Office General Order 10.6.002 PREA pages 15 states a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. During the past twelve months, there has not been such an incident.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) John I. Easley Criminal Justice Center prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed: <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 page 9

4. Consent Form
5. Victim Referral List

B. Interviews

1. PREA Coordinator
2. Contracted Medical Staff

The following delineates the audit findings regarding this standard:

115.81 (a) and (b) The John I. Easley Criminal Complex is not a prison; therefore, the facility is exempt with this part of the standard during this audit.

115.81 (c) and (d) If the screening indicates the inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, the Medical Staff at the John I. Easley Criminal Justice Center ensures the inmate is offered a follow-up meeting with the medical and/or mental health staff within 14 days of the intake screening as required by this part of the standard. Williamson County maintains a contract with Fast Access Healthcare for mental health services. All inmates are required to be seen by the medical staff during the intake process. Contracted Medical Staff will refer inmates as needed to Fast Access Healthcare Staff for mental health services and the Victim Referral List. Williamson County Sheriff's Office General Order 10.6.002 page 9 mandates this process. Therefore, the facility demonstrates compliance with this part of the standard during this audit.

115.81 (d) John I. Easley Criminal Justice Center requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. Interviews with the contracted Medical Staff corroborate this practice. The auditor did observe:

- the actual storage in the jail management system of any information/ documentation collected and maintained in hard copy pursuant to the PREA

	<p style="text-align: center;">Standards</p> <ul style="list-style-type: none"> - electronic safeguards of any information/documentation collected and maintained electronically pursuant to the PREA Standards <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.81 (e) John I. Easley Criminal Justice Center requires contracted Medical Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility unless the inmate is under the age of 18. The John I. Easley Criminal Justice Center has not housed an inmate under the age of 18 in the past 12 months. This was confirmed during an interview with the PREA Coordinator and by the auditor's observations during the onsite visit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff's Office General Order 10.6.002 PREA page 19 4. Memorandum of Understanding with the Sexual Assault Center of Nashville <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Contracted Medical Staff (Fast Access)

The following delineates the audit findings regarding this standard:

115.82 The Williamson County Sheriff's Office General Order 10.6.002 page 19, PREA details the agency's commitment to compliance. (a) John I. Easley Criminal Justice Center has a Memorandum of Understanding in place with the Sexual Assault Center of Nashville to treat inmate victims of sexual abuse. The facility also has medical and mental health staff at the facility ensuring inmates 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. Other services available include Williamson Medical Center and Mobile Crisis Counseling. This practice was corroborated through an interview with the medical staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (b) John I. Easley Criminal Justice Center has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. During the past twelve months, there have been three total alleged victims of sexual abuse at the John I. Easley Criminal Justice Complex. All three allegations were deemed to be unfounded. This practice was corroborated through an interview with two Medical Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 19, PREA details the agency's commitment to compliance. John I. Easley Criminal Justice Center ensures inmate victims of sexual abuse while incarcerated are 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. During the past twelve months, there have been three alleged victims of sexual abuse at the John I. Easley Criminal Justice Center. All three allegations were deemed to be unfounded. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (d) John I. Easley Criminal Justice Center requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. This practice was corroborated through an interview with the Medical Staff. During the past twelve months, there have been three reported victims of sexual abuse at the John I. Easley Criminal Justice Center. All three allegations were deemed to be unfounded. This was confirmed during an interview with the PREA Coordinator.

	Therefore, the facility demonstrated compliance with this part of the standard during this audit.
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> A. Documents <ul style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.2.006 PREA page 19 4. Medical and Mental Health Records B. Interviews <ul style="list-style-type: none"> 1. Medical and Mental Health Staff <p>The following delineates the audit findings regarding this standard:</p> <p>115.83 (a) The Williamson County Sheriff’s Office General Order 10.6.002 page 19, details the agency’s commitment to compliance. John I. Easley Criminal Justice Center offers medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. In the past twelve months, there was no incident where these services needed to be utilized. All three sexual abuse allegations were deemed to be unfounded. This was confirmed during an interview with two medical staff members. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.83 (b) John I. Easley Criminal Justice Center mandates that the evaluations 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. In the past twelve months, there was no incident where these services needed to be utilized. All three sexual abuse allegations were deemed to be unfounded. Staff was well versed if an incident did occur. This was confirmed during an interview with two medical staff members. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (c) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states John I. Easley Criminal Justice Center requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. This practice was corroborated through an interview with the medical staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (d and e) Based on John I. Easley Criminal Justice Center documentation requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. In the past twelve months, there was no incident where these services needed to be utilized. All three sexual abuse allegations were deemed to be unfounded. This was confirmed during an interview with two medical staff members. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (f) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states the John I. Easley Criminal Justice Center requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. In the past twelve months, there was no incident where these services needed to be utilized. All three sexual abuse allegations were deemed to be unfounded. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (g) The Williamson County Sheriff's Office General Order 10.6.002 page 19, states the John I. Easley Criminal Justice Center requires that medical and mental health staff provide treatment services 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. In the past twelve months, there was no

	<p>incident where these services needed to be utilized. All three sexual abuse allegations were deemed to be unfounded. Staff was well versed if an incident did occur. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.86	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 pages 15-16 4. Incident Review Form <p>B. Interviews</p> <ol style="list-style-type: none"> 1. Operations Captain 2. PREA Coordinator 3. Incident Review Team Members <p>The following delineates the audit findings regarding this standard:</p> <p>115.86 (a) Williamson County Sheriff’s Office General Order 10.6.002 pages 15 states that the John I. Easley Criminal Justice Center conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This process would be documented by utilizing the “Sexual Abuse Incident Review Report”. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.86 (b) John I. Easley Criminal Justice Center ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the “Sexual Abuse Incident Review Report” form. During the past twelve months, there have been three sexual abuse investigations; all were deemed to be unfounded by the PREA investigators. This process was confirmed during interviews with members of the review team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consists of upper-level management officials, with input from line supervisors, the PREA Coordinator, investigators, and medical or mental health practitioners. Team members were confirmed by the PREA Coordinator. During the past twelve months, there have been three sexual abuse investigations; all were deemed to be unfounded by the PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (d) Williamson County Sheriff’s Office General Order 10.6.002 pages 15 states that the review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in John I. Easley Criminal Justice Center where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. The agency has deployed an adequate PREA after-action review form that addresses all elements of the standard. This process would be documented by utilizing the Williamson County Sheriff’s Office “Sexual Abuse Incident Review Form”. Therefore, the facility exceeds the intent of this part of the standard.

115.86 (e) John I. Easley Criminal Justice Center shall implement the recommendations for improvement or shall document its reasons for not doing so. During the past twelve months, there have been three sexual abuse investigations; all were deemed to be unfounded by the PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed:

A. Documents

1. Williamson County Sheriff's Office OAS Pre-Audit Questionnaire/Audit Files
2. PREA Compliance Audit Instrument Checklist
3. Williamson County Sheriff's Office General Order 10.6.002 pages 16-17

B. Interviews

1. PREA Coordinator

The following delineates the audit findings regarding this standard:

115.87 The Williamson County Sheriff's Office General Order 10.6.002 page 16, details the agency's commitment to compliance. (a), (b) and (c) John I. Easley Criminal Justice Center collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions and aggregates the incident-based sexual abuse data at least annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Office of Justice. This process was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (d) John I. Easley Criminal Justice Center maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. During the past twelve months, there have been thirteen reports of sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (e) John I. Easley Criminal Justice Center does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (f) Upon request, John I. Easley Criminal Justice Center provides all such data

	<p>from the previous calendar year to the Office of Justice no later than June 30th when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist 3. Williamson County Sheriff’s Office General Order 10.6.002 PREA page 16 4. Annual Report <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator <p>The following delineates the audit findings regarding this standard:</p> <p>115.88 (a) The Williamson County Sheriff’s Office General Order 10.6.002 page 16, details the agency’s commitment to compliance. John I. Easley Criminal Justice Center reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as John I. Easley Criminal Justice Center as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.88 (b) Such reports include a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of John I. Easley Criminal Justice Center’s progress in addressing sexual abuse. Therefore, the</p>

	<p>facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.88 (c) John I. Easley Criminal Justice Center’s report is approved by the Sheriff and made readily available to the public by posting on the agency website. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.88 (d) John I. Easley Criminal Justice Center may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed:</p> <p>A. Documents</p> <ol style="list-style-type: none"> 1. Williamson County Sheriff’s Office OAS Pre-Audit Questionnaire/Audit Files 2. PREA Compliance Audit Instrument Checklist <p>B. Interviews</p> <ol style="list-style-type: none"> 1. PREA Coordinator <p>The following delineates the audit findings regarding this standard:</p> <p>115.89 (a) through (d) John I. Easley Criminal Justice Center PREA Coordinator makes all aggregated sexual abuse data, readily available to the public at least annually by posting in the lobby of the jail.</p>

	<p>All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. This was confirmed during an interview with the PREA Coordinator. During the site review, the auditor did observe:</p> <ul style="list-style-type: none"> - the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards - electronic safeguards of any information/documentation collected and maintained electronically pursuant to the PREA Standards <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.401 (a) and (b) The John I. Easley Criminal Justice Center did have a PREA audit during the first and second audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (h) The auditor has full access to all locations/areas of the John I. Easley Criminal Justice Center. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (i) The auditor did obtain all necessary copies of audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (m) The auditor was allowed to interview inmates in a private setting. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (n) The auditor did receive one correspondence letter from a Williamson County inmate. The inmate was not interviewed due to mental health concerns and violent behavior on the first day of the onsite visit. Audit notices were observed in every housing unit, as well as all common areas and lobby. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

<p>115.403 John I. Easley Criminal Justice Center has had a PREA audit in 2017 and in 2020; the final report is posted on the agency's website http://www.williamsoncounty-tn.gov/1741/PREA -Info. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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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.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	na

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

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

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

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

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

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

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

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

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

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

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	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	yes

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

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? 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	yes

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

	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,	yes

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

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

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

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

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

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

	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.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

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

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

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

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

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

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

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

	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.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

(f)		
	<p>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.)</p>	yes