

PREA Facility Audit Report: Final

Name of Facility: Delaware County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/14/2026

Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Full Name as Signed: Bryan Pearson

Date of Signature: 08/14/2026

AUDITOR INFORMATION

Auditor name: Pearson, Bryan

Email: bryan@pearsongroupllc.com

Start Date of On-Site Audit: 06/24/2026

End Date of On-Site Audit: 06/25/2026

FACILITY INFORMATION

Facility name: Delaware County Jail

Facility physical address: 844 U.S. 42, Delaware, Ohio - 43015

Facility mailing address: 844 US Highway 42 North, Delaware,

Primary Contact

Name:	Angela Dusthimer
Email Address:	adusthimer@co.delaware.oh.us
Telephone Number:	7408332943

Warden/Jail Administrator/Sheriff/Director

Name:	Nicholas Karafa
Email Address:	nkarafa@co.delaware.oh.us
Telephone Number:	740-833-2856

Facility PREA Compliance Manager

Name:	Angie Dusthimer
Email Address:	adusthimer@co.delaware.oh.us
Telephone Number:	7408332943

Facility Health Service Administrator On-site

Name:	Rhiannon Thew
Email Address:	rthew@co.delaware.oh.us
Telephone Number:	740-833-2847

Facility Characteristics

Designed facility capacity:	284
Current population of facility:	126
Average daily population for the past 12 months:	142
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys

Age range of population:	18 and above
Facility security levels/inmate custody levels:	Minimum/Medium/Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	65
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	17
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	272

AGENCY INFORMATION	
Name of agency:	Delaware County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	149 North Sandusky Street, Delaware, Ohio - 43015
Mailing Address:	
Telephone number:	

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

Agency-Wide PREA Coordinator Information			
Name:	Scott Burden	Email Address:	sburden@co.delaware.oh.us

Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

2

- 115.13 - Supervision and monitoring
- 115.51 - Inmate reporting

Number of standards met:

43

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-06-24
2. End date of the onsite portion of the audit:	2026-06-25

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?	☒ Yes ☐ No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	A telephone interview was conducted with staff at the HelpLine, a victim advocate organization DCSO has an MOU with for victim advocate services.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	284
15. Average daily population for the past 12 months:	142
16. Number of inmate/resident/detainee housing units:	28
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	☐ Yes ☒ No ☐ 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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	129
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	2
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	6
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	4

31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	2
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	21
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	65
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	272

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	17
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	10
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☐ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☐ Length of time in the facility ☒ Housing assignment ☒ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Inmates were randomly selected from the housing roster based on housing unit and gender as DCSO has both male and female inmates. Inmates were not selected based on geographical diversity. This would eliminate randomness.

43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	☒ Yes ☐ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	10
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".	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☐ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☒ The inmates/residents/detainees in this targeted category declined to be interviewed.

48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The list of inmates with disabilities did not provide the type of disability. The staff stated there were no inmates with visual impairment that needed assistance with the PREA education.
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The list of inmates with disabilities did not provide the type of disability. The staff stated there were no inmates with hearing impairment that needed assistance with the PREA education.
51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	1
52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	There were no allegations of sexual abuse during the 12 months preceding the audit.
55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	6
56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility reported no inmates being involuntarily placed in segregation for high risk of victimization during the review period.

57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☒ Shift assignment ☐ Work assignment ☐ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	☒ Yes ☐ No
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	16

63. Were you able to interview the Agency Head?	☒ Yes ☐ No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	☒ Yes ☐ No
65. Were you able to interview the PREA Coordinator?	☒ Yes ☐ No
66. Were you able to interview the PREA Compliance Manager?	☐ Yes ☐ No ☒ NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☒ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☐ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of CONTRACTORS who were interviewed:	1
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☐ Medical/dental ☐ Food service ☐ Maintenance/construction ☒ Other
70. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

71. Did you have access to all areas of the facility?

☒ Yes

☐ No

Was the site review an active, inquiring process that included the following:

72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

☒ Yes

☐ No

73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

☒ Yes

☐ No

74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

☒ Yes

☐ No

75. Informal conversations with staff during the site review (encouraged, not required)?

☒ Yes

☐ No

76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.
---	-------------------

Documentation Sampling

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

77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	☒ Yes ☐ No
---	--

78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
--	-------------------

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

79. 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

80. 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	3	0	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	3	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
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

82. 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.

83. 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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	0	2
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	1	0	2

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

0

a. Explain why you were unable to review any sexual abuse investigation files:

The facility reported no allegations of sexual abuse during the last 12 months.

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	3
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. 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**

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	☐ Yes ☒ No
--	--

Non-certified Support Staff

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

☐ Yes

☒ No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

☒ The audited facility or its parent agency

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

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

☐ Other

Standards
Auditor Overall Determination Definitions
- Exceeds Standard (Substantially exceeds requirement of standard) - Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) - Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) The Delaware County Jail has policy 803 Prison Rape Elimination Act that states "This office has zero tolerance with regard to sexual abuse and sexual harassment in this facility." The policy has provisions for preventing, detecting and responding to sexual abuse and sexual harassment incidents. The policy provides definitions for what behaviors are sexual abuse and sexual harassment that are prohibited. The Inmate Handbook also provides a list of prohibited behaviors and the sanctions that includes behaviors related to sexual abuse and sexual harassment. Staff Interviews - All staff interviewed knew the agency had a zero-tolerance policy for sexual abuse and sexual harassment. Staff described the zero tolerance as a duty to respond to reports of sexual abuse and sexual harassment. They said staff were required to report all knowledge or suspicion of sexual abuse, sexual harassment, retaliation, or staff failure to report. Inmate Interviews - Inmates said they were told about the zero tolerance policy against sexual abuse and sexual harassment on the first day at the jail.

	b) Delaware County Sheriff's Office policy 803 Prison Rape Elimination Act states "The Jail Director shall appoint an upper-level manager with sufficient time and authority to develop, implement, and oversee office efforts to comply with the PREA standards. The PREA coordinator shall review facility policies and practices, and make appropriate compliance recommendations to the Jail Director (28 CFR 115.11 b)." The policy reflects the requirements of the standard. The DCSO and DCJ organization charts were provided for review. The Assistant Jail Director (PREA Coordinator) reports directly to the Jail Director who reports to the Chief Deputy of Core Services. The Chief Deputy reports directly to the Sheriff, the Agency Head. The organization charts show the PREA Coordinator is an executive position in the Jail. PCM Interview - The Delaware County Jail has designated the Assistant Director as the PREA Coordinator. The PREA Coordinator was interviewed and stated he has enough time to oversee the agency's effort to comply with the PREA standards. He has a back-up PREA Coordinator that is the Accreditation Manager for the Agency. The PREA Coordinator has regular communication with the Jail Director regarding PREA compliance. If he identifies issues with PREA standards compliance, he can get the correction completed with the support of the Director. Based on the information from interviews, policies and documents reviewed, the auditor has determined the agency meets this standard.
--	--

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Delaware County has a contract with Shelby County to house Delaware County inmates. The contract is effective August 12, 2024 until July 1, 2027. Shelby County agrees to conform with the Prison Rape Elimination Act in the care, control and supervision of inmates accepted from Delaware County. Contract Administrator Interview- The Jail Director is also the Contract Administrator. He said Delaware County has a contract with Shelby County to house inmates for Delaware County when needed. He said the contract with Shelby County has a PREA compliance requirement. To monitor Shelby County's compliance, he requested they provide a copy of their PREA audit report. Document Review - A copy of Shelby County Jail's PREA audit report was provided. The onsite audit was in August of 2023. The final report was completed on 9/29/23 with a result of full compliance. Based on the information from interviews and documents reviewed, it has been determined the facility meets the standard.

115.13	Supervision and monitoring
	Auditor Overall Determination: Exceeds Standard Auditor Discussion a) Delaware County Sheriff's Office (DCSO) policy 1308 Staffing requires the Jail Director to complete an annual comprehensive review of the custody staffing plan. The custody staffing plan is to be reviewed by Jail Director and PREA Coordinator and modified as needed annually. The review will ensure staffing levels are sufficient to fill essential positions. When an essential position is not covered, the facility will document the reason for the deviation from the staffing plan. DCSO policy 1304 Staffing provides the procedure for developing the jail staffing plan. The procedure includes consideration of the ten factors in the standard for the development of the staffing plan and determining the need for video monitoring. The facility had an average daily population of 140 since the last PREA audit. The staffing plan was based on an average daily population of 139. Director Interview - The Jail Director said he reviews the staffing on a weekly basis with HR and the two Assistant Directors. They monitor the percentage of custody vacancies and develop plans to fill them. He said they complete an annual review of the staffing plan based on the requirements of the PREA standards just before the annual fiscal requests are due. The staffing plan is based on a preferred level of staffing. The preferred level of staffing is based on the mandatory posts. The Jail Director said he pays overtime to cover vacancies up to the preferred level of staffing. Deviations are when the preferred level (mandatory post) is not covered. All deviations are documented on the shift reports. The Jail Director regularly monitors the shift reports. PREA Coordinator Interview - The PREA Coordinator said he reviews staffing levels with the Jail Director and HR frequently. There are few deviations because they pay overtime to cover absences to cover mandatory posts. He conducts an annual review of the staffing with the Jail Director based on the PREA standard. Facility Tour - The Jail was toured on the first day of the onsite audit. The Assistant Jail Director (PREA Coordinator) and Accreditation Manager (Assistant PC) led the tour. The staffing levels observed during the tour provided an appropriate level of supervision in all areas that inmates were present. Staff were making rounds in housing units and posted in control rooms that could see into housing units as well as view video monitoring systems. Cameras were placed throughout the facility to cover general areas where inmates are housed as well as corners and hallways that could be blind spots. No area was found to be an unobserved blind spot. Staff in the control room could see who was requesting doors to be unlocked. Cameras were observed throughout the facility in inmates living areas, halls, the laundry, Food service, booking, and medical. b) The facility provided documentation of a day where the jail had no female staff available for a female inmate pat search as a deviation in the staffing plan.

Though it was a deviation from always having a male and female officer on a shift for searches, it was not a reduction of staff to supervise the inmates for the shift.

c) The 2024, 2025 and 2026 Staffing Analysis was provided for review. This document covers the review of the staffing plan based on detention and correctional practices; judicial findings of inadequacy; federal investigative findings; findings from internal or external oversight bodies; physical plant review; inmate population; number and placement of supervisory staff; programs on each shift; state and local laws, regulations and standards; sexual abuse investigation outcomes; and any other relevant factors. The review was thoroughly described for each of the factors. Video monitoring is mentioned in the review but did not provide as much detail. It is recommended the annual review provides a detailed review of the video monitoring system highlighting any needs identified or improvements made.

d) DCSO policy 1307 Administrative and Supervisory Inspections policy requires Jail supervisors to conduct and document unannounced rounds to identify and deter staff sexual misconduct on all three shifts. The unannounced rounds are to occur on all three shifts daily. The policy prohibits staff from alerting other staff that supervisor unannounced rounds are occurring.

Intermediate Staff Interview – A Lieutenant (Shift Supervisor) was asked how often rounds are conducted and how does he prevent staff from warning other staff unannounced rounds are occurring. He said he conducts rounds at least once or more every shift. He uses a random pattern each time he makes rounds to prevent staff from knowing where he is going next. He said he walks through units with the staff when doing rounds. Rounds are documented in the Jail Management System and the housing unit log. He said staff are prohibited from warning other staff by policy and can be subject to discipline if they do.

Document Review – Logs were provided for random consecutive dates in three months selected to review for unannounced rounds. Unannounced rounds were documented on each shift at least once by intermediate supervisors on each day that was reviewed. Logs were also provided that documented unannounced rounds by the Jail Director, Assistant Jail Directors and other intermediate supervisors more than once per month on each shift. This is found to exceed the best practice of once per week per the standards in focus.

DCSO policies require an annual review of the custody staffing plan with input from the Jail Director and PREA Coordinator, including documentation of any deviations from required staffing levels. Interviews confirmed that staffing is reviewed regularly, overtime is used to cover mandatory posts, and deviations are monitored through shift reports. Tour observations and documentation showed appropriate supervision, effective camera placement, documented unannounced rounds on all shifts; the annual staffing analysis was thorough, with a recommendation to provide more detail on video monitoring review.

Based on the information from interviews, policies and documents reviewed, it has been determined the facility exceeds the standard.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Delaware County Sheriff's Office policy 507 Juvenile Housing states "Juveniles and youthful offenders will both be identified as "juveniles", meaning they are both under 18 regardless of the court of supervision." This policy requires "juveniles" to be housed separately from adults. The policy also prohibits placing juveniles in a minimum security jail. Juveniles may not be placed in isolation to comply with this policy. During informal conversations with the Jail Director and PREA Coordinator, both stated the jail has not had a juvenile or youthful inmate under 18 in years. The practice has been to not house a juvenile in the jail. However, the DCJ does have a policy that covers how to house a juvenile or youthful inmate under 18 if this were to be unavoidable. Facility Tour - During the tour of the jail, the PREA Coordinator showed this auditor a cell block that was unoccupied that would be used to house a juvenile if they did receive one. The cell block was not adjacent to an adult housing unit and would provide sight and sound separation if used. All programming and activities could take place on the cell block if needed. An age summary report from Jail Tracker System for all inmates received at DCS was provided for May 2023 to April 2025. There were no inmates received under the age of eighteen during the review period. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) DCSO policy 809 Searches prohibits opposite gender staff from pat searching inmates absent exigent circumstances. If an opposite gender pat search is conducted, a supervisor must be present to observe the search. The policy requires written authorization for a strip search from a supervisor except in the case of an emergency. Strip searches must be conducted by staff of the same gender as the inmate except in exigent circumstances. Female inmates cannot be restricted access to regularly available programming or out of cell time to comply with the restriction of cross-gender pat searches. Tour - The area where strip searches are conducted was observed on the tour. Same

gender staff have the inmate undress in a shower room. The area is private and out of view of other staff and inmates.

Inmate Interviews – Inmates said all pat searches were conducted by same gender staff. All inmates reported only being strip searched at intake by same gender staff. No other strip searches had been conducted.

Staff Interviews – Staff said they were prohibited from conducting cross-gender pat searches unless there were exigent circumstances. All said there is only one search that is close to a strip search at the booking area. These are always conducted by staff of the same gender as the inmate. All staff said they completed training for cross-gender strip searches.

The facility provided documentation of one incident of cross gender pat searches being conducted by male staff on female inmates to clear them for a volunteer led program. The Director said the female officer scheduled that day had to leave and the pat searches were required for the safety of the volunteers providing the program the inmates were attending. The searches were observed by a supervisor and recorded on body worn camera and area video monitoring. An incident report was written by the officer conducting the searches and the Shift Supervisor emailed the PREA Coordinator/Assistant Jail Director to notify him of the searches.

c) DCSO policy 809 Searches requires all cross gender pat searches to be documented.

Document Review - An incident report was written by the officer conducting the searches and the Shift Supervisor emailed the PREA Coordinator/Assistant Jail Director to notify him of the searches.

d) DCSO policy 701 Supervision of Inmates requires modesty screens in inmate bathrooms that prevent non-medical staff from seeing an inmate's breasts, buttocks or genitalia while inmates shower and use toilets without creating areas staff cannot supervise. Opposite gender staff are required to make an announcement when entering a housing unit.

DCSO policy 1006 Inmate Hygiene states inmates shall be allowed to shower, perform bodily functions and change clothes without opposite gender staff viewing their buttocks, genitals or breasts unless there are exigent circumstances or the viewing is incidental to cell checks.

DCSO policy 1301 Control Center requires cameras to be placed so that inmates cannot be viewed by cross-gender staff while performing bodily functions, showering and changing clothes.

Inmate Interviews – Inmates interviewed said they hear staff of the opposite gender make an announcement when they enter their housing unit. All inmates stated they can use the toilets and showers without being seen by staff of the opposite gender.

Staff Interviews – Staff said they are required to make an announcement when entering an opposite gender housing unit or bathroom. All staff said the inmates can

	use the showers and toilets without being seen in a state of undress by staff due to the walls and shower curtains that provide. Tour Observations - Male and female staff accompanied this auditor on the tour. Announcements were made when we entered all housing units. There were no areas found that created a cross-gender viewing issue other than incidental viewing during security checks. Cells with cameras inside had a digital black box placed on the toilet and shower that blocked the view of the inmate's genitals and buttocks. The camera view was checked in the control rooms to verify the black box for obscuring blocked the view of the areas where an inmate would be seen undressed. All staff have the same access to the camera system and see the same black boxes in observation cells. Opaque/frosted films were used on the lower part of windows in suicide observations cells in booking that provided a modesty screen for viewing into the cell blocking the view of the toilet for privacy. DCSO policies prohibit cross-gender pat searches and strip searches except in exigent circumstances, require documentation and supervisor oversight when such searches occur, and protect female inmates' access to programming and out-of-cell time. Interviews, tour observations, and document review confirmed that searches are generally conducted by same-gender staff, strip searches occur in a private area, and the one documented cross-gender pat search incident was supervised, recorded, reported, and documented. Policies and facility practices also protect inmates from cross-gender viewing while showering, changing clothes, or using toilets through modesty screens, camera privacy blocks, opposite-gender announcements, and facility design features observed during the tour. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	---

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 810 Inmates with Disabilities requires the Jail Director to establish procedures to assess and reasonably accommodate disabilities of inmates. The policy requires the DCJ to provide access to telephones equipped with a TDD for inmates who are deaf, hard of hearing or have speech impairment; use subtitles in orientation videos for inmates with hearing impairment. DCSO policy 803 Aids for Deaf, Hearing Impaired, and Speech Impaired Inmates requires the toll-free numbers for the external reporting and the victim advocate organization to be provided to disabled inmates for use on a TTY Machine to either make a report of sexual abuse or sexual harassment or contact a victim advocate for

services.

Risk Assessment Staff Interview – The assessment interview is conducted by a trained nurse. She said if an inmate is unable to communicate effectively in English, she would use the Language Line for interpretive services to complete the interview.

Intake Education Staff Interview - A Corrections Officer that provides the initial PREA information at booking said if an inmate cannot speak English a telephonic interpretive service is used to provide the information. The jail has a braille version of the brochure if the inmate is blind and can read braille. He reads the brochure if they cannot read.

Comprehensive Education and Re-assessment Staff Interview - A Corrections Officer that provides the comprehensive PREA education said if she identifies a disability, she provides accommodations that will allow the inmate to understand the PREA information. This may be reading the brochure to the inmate, utilizing the Language Line for sign language or language interpretation, using a device for hearing impaired, or requesting assistance from the mental health staff for inmates with cognitive disabilities.

b-c) DCSO policy 811 Limited English Proficiency Services provides guidance to staff for communication with LEP inmates in relation to reporting and responding to sexual abuse and sexual harassment that include use of the Language Line interpretive service. The policy instructs staff not to rely on inmate interpreters except where an extended delay in accessing an interpreter could compromise the victim's safety.

Interpretive Language Services – The facility provided documentation of their account with the Language Line. The Language Line is an interpretive service that can provide telephonic language interpreters and video sign language interpreters. The facility also has handheld translator devices that are readily available to staff when needed. The interpretive device was used to interview an LEP inmate and was a very effective interpretive service.

Kiosk Spanish Translation – The Kiosks provided to the inmates has a Spanish version for the services provided. This was observed on the tour.

Spanish PREA Brochure- The PREA brochure that provides inmates information on how to make a report of sexual abuse and sexual harassment is available in a Spanish translation.

Staff Interviews- All staff were aware of a telephone interpreter service that is available to assist them with receiving a report from an LEP inmate if needed. They did not know how to access the service directly, but said the Shift Supervisors have that information and they would take the inmate to them for assistance. They said there is an interpreter device that could be used as well. All staff said they would not use an inmate as an interpreter to receive a report of sexual abuse or sexual harassment due to confidentiality and safety for the victim.

	Comprehensive Education and assessment Staff Interview – The staff interviewed said she would use the Language Line interpreter service for an inmate that was identified as LEP. The PREA education is provided in a one-on-one meeting. She also provides a risk reassessment at 25 days. She completes another interview with the inmate to complete the reassessment. If the inmate is LEP she would use the telephone interpreter service or the interpreter device to complete the interview with the inmate. Inmate Interview – One inmate identified as LEP was interviewed. The interpreter device was used to conduct the interview due to it being used most often. The device allowed for a conversation with the inmate. He said the staff used the device to provide him with the information about reporting sexual abuse and sexual harassment and to ask the questions for the risk assessment at intake. Facility Tour – Spanish PREA information posters were observed throughout the facility in inmate housing areas and areas where the inmates may pass by like booking and medical. The inmate kiosks had an option for Spanish language access that would allow a Spanish speaking inmate to send a report of sexual abuse that would be translated to English. DCSO policies and facility practices provide reasonable accommodations to ensure inmates with disabilities and limited English proficiency can understand PREA information, complete risk assessments, access reporting options, and receive assistance without relying on inmate interpreters except in limited emergency circumstances. Interviews and document review confirmed the availability of TDD/TTY access, subtitles, braille materials, staff assistance with reading materials, telephonic and video interpretation through Language Line, handheld interpreter devices, Spanish-language PREA materials, Spanish kiosk access, and posted PREA information throughout the facility. Staff demonstrated awareness of available interpretation resources and confidentiality concerns, and the LEP inmate interview and facility tour confirmed that these services are accessible and effective in practice. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	---

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard Auditor Discussion a) Delaware County Sheriff's Office policy 300 Member Screening, Selection and Recruitment states no staff or contractors shall be hired that have engaged in sexual abuse, been convicted of engaging in or attempting to engage in sexual crimes in the community or has been civilly adjudicated to have engaged in sexual crimes in the community.

DCSO policy 314 Special Assignments and Promotions applies the requirements in provision (a) to promotions and transfers.

HR Staff Interview – The HR Manager said all applicants are asked questions about prior sexual abuse, convictions or civil judgements for sexual abuse at the time of interviews.

b) DCSO policy 300 Member Screening, Selection and Recruitment and DCSO policy 314 Special Assignments and Promotions requires consideration of sexual harassment when hiring or promoting staff or when enlisting services of a contractor.

HR Staff Interview – The HR Manager said all staff are asked if they have engaged in sexual harassment at the time of the interview.

Document Review – PREA Questionnaire forms were reviewed for nine new staff hired in the last 12 months. All nine completed the questionnaire prior to being hired. The form included a question about sexual harassment.

c) DCSO policy 300 Member Screening, Selection and Recruitment requires a criminal background check to be conducted prior to hiring staff. The policy also requires contact with all prior institutional employers for information regarding substantiated allegations of sexual abuse or resignations during such investigations.

HR Staff Interview – The HR Manager said all applicants are asked if they have prior institutional experience. If they have prior institutional experience, she contacts the prior institutional employer to ask if the applicant had a substantiated investigation of sexual abuse or resigned during the investigation.

Document Review – Criminal background checks were reviewed for nine staff hired in the last 12 months. All nine had a criminal background check completed prior to their hire date.

d) DCSO policy 300 Member Screening, Selection and Recruitment requires a criminal background check be conducted prior to hiring contract staff.

Document Review - Criminal background checks were reviewed for four contract staff that started work at DCSO in the last 12 months. All four had a criminal background check completed prior to their start date.

e) DCSO policy 300 Member Screening, Selection and Recruitment requires a criminal background check on current staff and contractors every four years.

HR Staff Interview – The HR Manager said criminal background checks are completed on current staff every 4 years.

Document Review – criminal background checks for eight veteran staff and three current contract staff were reviewed. All eight staff and had a criminal background check completed in 2025. The three contract staff had a criminal background check completed when they had started less than four years ago.

f) DCSO policy 300 Member Screening, Selection and Recruitment requires

	asking applicants on written applications for hiring or promotion about the misconduct in paragraph (a) of standard 115.17. The policy also advises staff, volunteers and contractors that they have a continuing affirmative duty to disclose any sexual misconduct described in paragraph (a) of standard 115.17. HR Staff Interview – The HR Manager said staff are asked the questions for provision (a) again at their annual evaluation. All staff are informed of an affirmative duty to report any future misconduct in provision (a). Document Review - PREA Questionnaire forms were reviewed for nine new staff hired in the last 12 months. All nine completed the questionnaire prior to being hired. The questionnaire asked staff if they had committed prior sexual abuse, been convicted of or had a civil judgement for sexual abuse. The PREA Questionnaire also included statement about a continuing affirmative duty to disclose misconduct related to provision (a). g) DCSO policy 300 Member Screening, Selection and Recruitment advises staff and contractors that material omissions regarding sexual abuse or the provision of false information are grounds for dismissal h) DCSO policy 803 Prison Rape Elimination Act states “Unless prohibited by law, the Office shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.” HR Staff Interview – The HR Manager said DCSO would provide information about sexual abuse investigations or resignations during an investigation if another agency requests it for a former employee. DCSO policies and hiring practices establish screening requirements for employees, promotions, transfers, and contractors that prohibit hiring or advancement of individuals with prior sexual abuse, relevant criminal convictions, or civil adjudications, and require consideration of prior sexual harassment. HR interviews and document review confirmed that applicants are asked PREA-related screening questions, new staff complete PREA questionnaires before hire, criminal background checks are completed before hiring staff and contract staff, prior institutional employers are contacted when applicable, and current staff and contractors receive periodic background checks at least every four years. Policies also require applicants, staff, volunteers, and contractors to disclose relevant misconduct, allow dismissal for material omissions or false information, and provide for disclosure of substantiated sexual abuse or sexual harassment information to institutional employers when legally permitted. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	---

115.18	Upgrades to facilities and technologies
---------------	--

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 1310 Space and Environmental Requirements states “During the planning phase of any expansion or modification of existing facilities, consideration shall be made as to whether the effect of the design, acquisition, expansion, or modification would affect the Office’s ability to protect inmates from sexual abuse.” b) DCSO policy 1310 states “When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the Jail Director or authorized designee shall consider how such technology may enhance the agency’s ability to protect inmates from sexual abuse.” Agency Head Interview – The Sheriff said that modifications and upgrades to the physical plant are completed through a contract company with the PREA Coordinator included to ensure modifications and additions meet the PREA standards. There were no additions during the review period. Facility Head Interview – The Jail Director said the PREA Coordinator is included to review PREA standards requirements in any planning of jail modifications or adding cameras. Improving protecting inmates from sexual abuse would be a factor in the planning of any jail modification or expansion and installation of new video systems. He said there have been none since the last audit. Based on the information from interviews and policies reviewed, it has been determined the facility meets the standard.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Delaware County Sheriff’s Office policy 803 Prison Rape Elimination Act states “This office and its designated investigators shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.” DCSO policy 602 Patrol Sexual Assault Investigations provides procedures for collecting and testing biological evidence in sexual assault cases and provides the procedures for conducting a sexual abuse investigation in a confinement setting that includes the collection of DNA evidence and collecting a rape kit following a forensic exam. DCSO policy 802 Property Section provides procedures for the proper storing of physical evidence.

Random Staff Interviews – Staff were asked how they can protect physical evidence in a sexual abuse case. All staff know they must prevent the victim or perpetrator from changing clothes, showering, eating, drinking, using the bathroom, and smoking to protect evidence on the person or in clothing. All staff said they would secure a cell or area where the sexual abuse occurred, if identified, to protect evidence.

b) The Delaware County Jail has policy 803 Prison Rape Elimination Act that states “Evidence collection protocols shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the US DOJ 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.”

c) DCSO policy 803 Prison Rape Elimination Act states “Inmates who are victims of sexual abuse shall be transported to the nearest appropriate location for treatment of injuries and collection of evidence, and for crisis intervention services.”

DCSO policy 904 Medical Fees states no fee will be charged for care initiated by a qualified health care professional or a staff member. There will also be no fee for emergency care.

DCOS provided a copy of Ohio Revised Code section 2907.29 Hospital Emergency Services for Victims of Sexual Offense that requires every Ohio hospital that provides emergency services to have a qualified staff on call 24 hours a day to provide forensic examinations for evidence collection for victims of sexual offenses.

d) DCSO policy 803 Prison Rape Elimination Act states “A victim advocate from Helpline of Delaware County shall be made available to the victim. A Supervisor shall call the Helpline hotline at 1-800-684-2324 and speak with a representative. An advocate will be dispatched by Helpline to the local emergency department or the jail.”

PREA Coordinator Interview – The PREA Coordinator said a victim advocate from Helpline would come to the hospital if an inmate is taken there for a forensic examination if the victim requests an advocate. The victim advocate is also requested for investigative interviews if the victim chooses to have one present during interviews.

Victim Advocate MOU – The Delaware County Jail provided a copy of an MOU with HelpLine, a victim advocate organization, to provide victim advocate services to inmates at DCJ. The MOU is effective from July 16, 2024 until September 16, 2026. In the MOU, HelpLine agrees to provide emotional support services to inmates at DC Jail that are prior victims of sexual abuse through a hotline, provide victim advocate services at forensic examinations at the hospital, and provide supports services during investigative interviews at the DC Jail when requested.

e) DCSO policy 803 Prison Rape Elimination Act states “If requested by the victim, a victim advocate, a qualified office staff member or a qualified community

	organization staff member shall accompany the victim through the forensic medical examination process and investigatory interviews.” Victim Advocate Interview – This auditor called the 800 number for the HelpLine. This auditor spoke to a HelpLine staff that said they would provide a victim advocate if requested at the hospital for the forensic exam. If an inmate requests a victim advocate to be present during the investigator interview at the jail, the HelpLine could send a victim advocate from their SARN to be with the victim during the interview. DCSO policies establish a uniform evidence protocol for sexual abuse investigations, including procedures for preserving, collecting, storing, and testing physical and biological evidence, as well as transporting victims for treatment, forensic examination, evidence collection, and crisis intervention services. Staff interviews confirmed that staff understand how to protect evidence by preventing victims or alleged perpetrators from taking actions that could compromise physical evidence and by securing any identified crime scene. Policies also require evidence collection protocols to be developmentally appropriate and based on authoritative forensic examination standards, provide forensic medical services at no cost, and make victim advocate services available through HelpLine during forensic exams and investigative interviews when requested. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	--

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act and DCSO patrol policy 602 Sexual Assault Investigations states “An administrative investigation, criminal investigation or both shall be completed for all allegations of inmate sexual abuse and sexual harassment.” Agency Head Interview – The Sheriff said all allegations of sexual abuse and sexual harassment are investigated. The administrative investigation is completed by trained jail staff and the criminal investigations are completed by detectives. Investigation Reports – Three investigations that were completed during the last 12 months were provided for review. All three were allegations of sexual harassment that had an administrative investigation. b) DCSO policy 803 Prison Rape Elimination Act and DCSO policy 602 Sexual Assault Investigations states “The agency receiving the referral for criminal investigation, whether a part of this agency or an outside entity, shall have the legal

	authority to conduct such criminal investigations.” Criminal Investigator Interview – A detective from the Sheriff’s Office said if there is an allegation that could be a violation of criminal law, a detective is contacted immediately and assigned the criminal investigation. This would include most allegations of sexual abuse. He said the detectives complete Ohio law enforcement academy training that includes sexual assault investigations. He has also completed the Specialized Investigation training required in standard 115.34 through the NIC PREA Learning Center. There are eight Detectives in the Sheriff’s Office that were qualified to do criminal PREA investigation based on training documentation. Administrative Investigator Interview – The Sergeant that works in the jail that is the staff designated as the Investigator for administrative investigations said she is contacted immediately for all reports of sexual harassment and sexual abuse. She said there are other staff trained to do administrative investigations in addition to her. Training records were provided for eleven staff that could do administrative investigations. DCSO policies require that all allegations of inmate sexual abuse and sexual harassment receive an administrative investigation, criminal investigation, or both. Interviews confirmed that administrative investigations are completed by trained jail staff, while allegations involving potential criminal conduct are referred immediately to qualified Sheriff’s Office detectives. Investigation records and training documentation showed that recent allegations were investigated and that both criminal and administrative investigators have the authority and training needed to complete PREA-related investigations. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	---

115.31 Employee training	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 306 Prison Rape Elimination Act Training requires all staff that may have contact with inmates to complete training on the prevention of sexual abuse and sexual harassment in the DCSO Jail. The policy requires training to cover at a minimum the following topics: The DCSO zero tolerance policy; staff responsibilities for prevention, detection, reporting and response; rights of inmates to be free from sexual abuse and sexual harassment; rights of inmates and staff to be free from retaliation; the dynamics of sexual abuse; common reactions of victims; how to detect and respond to signs of sexual abuse; how to avoid inappropriate relationships with inmates; communication with LGBTI inmates; and mandatory reporting to outside agencies.

Training Curriculum Review – There were three PREA training curriculums reviewed. One was for new staff and provided pre-service training. The PREA Training for New Employees curriculum covered all ten training topics required by this standard plus cross gender search training. A PREA training curriculum from Relias covered all required topics except the mandatory reporting. A PREA In-Service Refresher training curriculum has recently been used to provide staff training specific to PREA implementation at the jail. This curriculum did not cover reactions of sexual abuse victims, how to avoid inappropriate relationships and mandatory reporting. The two training curriculums for in-service training did not fully meet the standard by not covering the mandatory reporting. The facility must add the mandatory reporting requirement to the in-service curriculum and provide the information to all current staff.

Recommendation - It is recommended the facility use the training curriculum for new staff for all staff training each year.

Staff Interviews - Staff said the training covered zero-tolerance policy; rights of residents and staff; dynamics of sexual abuse; signs and reactions of sexual abuse victims; how to avoid inappropriate relationships with residents; how to respond to a report of sexual abuse; and how to protect evidence. Staff demonstrated a thorough knowledge of all topics and could clearly describe their responsibilities in response to a report of sexual abuse or sexual harassment. All staff hired in the last year said they had completed the training prior to working around inmates when they were hired at DCSO. All veteran staff said they have completed the training annually.

b) DCSO policy 306 requires the training to be tailored to the gender of the inmates at the member's facility.

The training curriculum reviewed covered information for both male and female inmates. The DCSO Jail houses both male and female inmates and the staff work all areas of the jail, therefore they would not be reassigned.

c) DCSO policy 306 requires PREA training to be completed every two years with refresher training in years staff do not complete the PREA training.

Recommendation - Though the policy requires the training to be completed every two years, evidence reviewed and interviews indicate the training is completed annually. It is recommended the policy be changed to reflect the current practice of annual training.

d) DCSO policy 303 Corrections Officer Training requires all training conducted by the Office to be documented by employee signature or electronic verification that the member understands the training they have received.

Staff Training records – Training records were requested for nine new staff. All nine were found to have completed the training shortly after their hire date. Training records were requested for eight current veteran staff. All eight had completed the training in the last year.

	Corrective Action Required: The facility must provide all staff the training information on mandatory reporting of sexual abuse to state authorities in accordance with Ohio state law. Documentation of staff receiving the information must be provided. Corrective Action Completed: The PREA training curriculum for in-service was revised to add material that covered mandatory reporting to state agencies for vulnerable adults. The facility PREA Coordinator sent the training material to all staff. They were required to log into the training platform and acknowledge they reviewed the mandatory reporting information. Documentation was provided showing that all staff reviewed the new training information. Based on the information from interviews, policies and documents reviewed, it has been determined DCSO meets all provisions of the standard.
--	--

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion DCSO policy 316 Volunteers requires any volunteer that has contact with inmates to complete a training curriculum titled "Their Responsibilities under the Prison Rape Elimination Policy and Procedure." The policy requires the training to be based on the services they provide and the level of contact they have with inmates. All volunteers that have contact with inmates will be notified of the DCSO zero tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. Document Review – The DCSO Handbook for Contractors and Volunteers provide information about the Prison Rape Elimination Act, the DCSO zero tolerance policy, how to report sexual abuse or sexual harassment, how to detect signs of sexual abuse and sexual harassment, and maintaining professional relationships with inmates. Contract Staff Training Curriculum – The PREA for Contractors curriculum and the Security Training for Contractors curriculum provide contract staff information about the zero-tolerance policy, definitions of sexual abuse and sexual harassment, methods of reporting for inmates, signs of sexual abuse, and contract staff procedures to follow in response to a report of sexual abuse or sexual harassment. Volunteer PREA Training – Volunteers are provided with PREA information at volunteer orientation about the zero-tolerance policy, detecting sexual abuse and sexual harassment, responsibilities to report sexual abuse or sexual harassment, and how inmates can report. b) Contract Staff Interview – A food service contract staff said she completes the PREA training annually with both DCSO and Trinity. She said the training consisted of the zero-tolerance policy, how to respond to a report or knowledge of sexual abuse or

	sexual harassment, and what the signs are for sexual abuse. She said she is required to immediately notify the custody staff, her supervisor and the PREA Coordinator. Volunteer Interview – A religious services volunteer said she completed the PREA training when she started providing services at DCSO. She has had some refresher information every year since then. She said the training covered the DCSO zero-tolerance policy, signs of sexual abuse, and her responsibilities if she receives a report from an inmate or becomes aware of sexual abuse or sexual harassment. She said she is required to immediately notify a custody staff, shift supervisor or the PREA Coordinator. c) Document Review – the training completion Waivers were requested for seven contract staff and six volunteers. All contract staff had completed the PREA training prior to starting work at the facility and all volunteers had completed the Volunteer PREA training prior to beginning volunteer services. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	--

115.33 Inmate education	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 503 Inmate Handbook and Orientation requires sexual abuse and sexual harassment information to be covered in the inmate orientation within 24 hours of intake. The information includes zero-tolerance policy, prevention and intervention, avoiding being a victim, how to report incidents, treatment and counseling for victims, victim advocacy contact information, confidentiality, monitoring and mandatory reporting. Observation – An intake booking was observed. The Officer verbally told the inmate information about the zero-tolerance policy against sexual abuse and sexual harassment at DC Jail. He also directed the inmate to review the poster on the wall and the Kiosk on the housing unit that provide the information he would need to report sexual abuse or sexual harassment while at DC Jail. b-c) DCSO policy 503 Inmate Handbook and Orientation requires a comprehensive PREA education will be provided within 30 days of intake that covers inmates right to be free from sexual abuse, sexual harassment and retaliation. The education will also include the agency policies and procedures for responding to reports. Observation – a 30 day comprehensive education was observed. A Correctional Clerk provided an inmate the 30 day education in an individual meeting. The Correctional Clerk asked the inmate if she needed any accommodation for disabilities and was able to read the material. The staff read the information from the reporting poster

	and the brochure. The inmate was then asked questions about the material to determine if she understood it and sign the comprehensive education form. d) DCSO policy 811 Limited English Proficiency Services requires staff to take steps to ensure inmates that are limited English proficient can understand the DCSO's PREA prevention program by using interpretive services. Inmate interpreters or readers are prohibited except in limited circumstances. The DCSO Jail has a contract with the Language Line for interpretive services and sign language services. DCSO also has a device to assist in language translation. One was used to interview an LEP inmate. The brochure and PREA signs are translated to Spanish. The inmate Kiosk has a Spanish version that provides information for reporting sexual abuse and sexual harassment. The inmate phones have a Spanish option as well. The staff providing PREA education read the brochure to all new inmates at the comprehensive education. This provides information to inmates that cannot read or have visual disabilities. The Jail has equipment to enable communication with inmates that have a hearing impairment that can be utilized for the PREA education. e) DCSO policy 503 Inmate Handbook and Orientation requires the PREA education completion be documented and scanned into the Jail Management System. PREA Education Completion Documents – When the brochure is reviewed with the inmate at intake, the staff have the inmate sign the brochure at the bottom to document that they have received the information. The completion of the comprehensive education is documented on the PREA – Comprehensive Inmate Education form. These documents were reviewed for 30 inmates. All thirty had a signed brochure form on their intake date, twenty-two had completed the comprehensive education within 30 days of arrival. Seven were released prior to 30 days and receiving comprehensive education. One refused to participate and the word Refuse was written on the education form with no date or signature. The facility was asked to instruct staff to write refused and sign/date the form with a staff witness when an inmate refuses to participate in the PREA education. After the PREA Coordinator provided the instruction to staff via email and three examples of inmates refusing to participate in the comprehensive education. The staff documented the refusal, signed, dated and had a staff witness on the form. The current practice is determined to be substantially compliant with the standard. Based on the information from interviews, observations, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	--

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

	a-b) DCSO policy 303 Prison Rape Elimination Act Training requires investigators to complete a specialized investigative training in addition to the annual PREA training. The training is required to include a uniform evidence protocol, techniques for interviewing sexual abuse victims, use of Miranda and Garrity. c) Investigator Interview – Staff that conduct administrative investigations and criminal investigations were interviewed. Both were asked questions about the specialized training they received for investigating sexual abuse in a confinement setting. Both said they completed a National Institute of Corrections course. The course is PREA: Investigating Sexual Abuse in a Confinement Setting. Training Curriculum Review –NIC Investigating Sexual Abuse in a Confinement Setting provides information about a uniform evidence protocol, techniques for interviewing sexual abuse victims, use of Miranda and Garrity, and the criteria for evidence to substantiate a case for administrative investigations. Training Records – The facility provided NIC training certificates for all 19 investigators. Eleven are administrative investigators that are shift supervisors at the jail and eight are criminal investigators that are Detectives with the Sheriff’s Office. The Detectives also complete the Ohio Law Enforcement training that includes sexual assault investigations. Documentation of PREA annual training completion was provided for all investigators. Based on the information from interviews, policies and documents reviewed. It has been determined DCSO meets all provisions of the standard.
--	---

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion DCSO policy 306 Prison Rape Elimination Act Training requires medical and mental health staff to complete specialized medical training the covers detecting and assessing signs of sexual abuse and sexual harassment; preserving physical evidence; responding effectively and professionally to victims; reporting allegations or suspicions of sexual abuse and sexual harassment. Medical Staff Interview – Medical staff said she completed the specialized medical PREA training and the annual PREA training. The specialized medical training covered signs of sexual abuse, evidence protection, communication with victims, and her responsibilities in response to a report of sexual abuse. Mental Health Staff Interview – Mental health staff said she was required to complete the PREA medical Specialized training and the annual PREA training for contract staff. She said the medical training covered protecting evidence, signs of sexual abuse, communication with victims of sexual abuse, and responsibilities of responding to a

	report. Curriculum Review - The NIC training curriculum provides information about what is sexual abuse and sexual harassment; how to detect and assess sexual abuse and sexual harassment; preserving physical evidence; how to respond and communicate with victims; how medical and mental health staff are to report any knowledge or suspicion of sexual abuse and sexual harassment. The PrimeCare PREA Medical Training covers detecting signs of sexual abuse and sexual harassment; preserving evidence; communicating effectively and professionally with victims; and reporting requirements. The training curriculum covers the requirements of this provision of the standard. Specialized Medical Training Records - The training records for four contract medical and one contract mental health staff were requested for review. All four completed the NIC Specialized Medical PREA Training and one completed Relias PrimeCare PREA Medical Training. PREA Training Records - The PREA training records were requested for four medical staff and one mental health staff. All five had completed the PREA training during the review period. DCSO policy requires medical and mental health staff to complete specialized PREA training covering detection and assessment of sexual abuse and sexual harassment, preservation of physical evidence, professional response to victims, and reporting responsibilities. Interviews with medical and mental health staff confirmed completion of specialized medical PREA training and annual PREA training, and curriculum review verified that both the NIC Specialized Medical PREA Training and PrimeCare PREA Medical Training address the required topics. Training records for contract medical and mental health staff confirmed completion of specialized medical PREA training, and all reviewed medical and mental health staff completed PREA training during the review period. Based on the information from interviews, policies and documents reviewed, it has been determined DCSO meets the provisions of the standard.
--	--

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-d) DCSO policy 509 Inmate Classification and policy 801 PREA Risk Assessment requires an intake risk screening to be completed on an objective screening instrument within 72 hours of arrival at the facility. The factors for risk of victimization are disabilities, civil immigration detainer, vulnerability, prior sexual abuse victimization, prior convictions for sex offenses against a child or adult, only non-violent criminal history, prior incarceration, physical build, and identification as LGBTI.

e) DCSO policy 509 Inmate Classification policy 801 PREA Risk Assessment requires the factors to determine the risk of abusiveness to be prior acts of sexual abuse, prior convictions for violent offenses, prior history of sexual abuse in a confinement setting, and a prior history of institutional violence.

Risk Screening Staff Interview – A Nurse that asks intake risk assessment screening questions was interviewed. He said he asks inmates all sixteen questions on the risk assessment when they are booked into jail on the first day. He fills in the answers and turns the form into the Corrections Clerk. A Corrections Clerk was interviewed and asked what her role is at the intake risk assessment. She said the nurses ask the questions at intake and then she reviews the accuracy of the inmate answers to questions about criminal record, age, history of sexual abuse and prior violence based on the inmate records.

f) DCSO policy 509 Inmate Classification requires the inmate to be reassessed at 25 days from arrival.

Risk Screening Staff Interview – A Corrections Clerk said she reviews the risk assessment at 25 days. She asks the inmate the same questions from the intake assessment again to look for changes, then completes the section on the bottoms of the assessment for the reassessment within 30 days. If there are changes in the inmate's answers, she will fill in the answers in the 30-day review section of the form.

Document Review – Risk assessments were reviewed for thirty inmates randomly selected from the intake list for the last 12 months. All thirty had an intake assessment completed on the day of arrival. Seven were released prior to the 30-day reassessment. Twenty-two had a completed reassessment documented within 30 days of the inmate intake date. The staff wrote "Refused" on one reassessment with no staff signature or date. The PREA Coordinator was asked to instruct the risk assessment staff to complete an initial assessment and reassessment regardless of the inmate refusing to participate. The PC sent an email to all affected staff instructing them to complete the assessment based on the information that they have when an inmate refuses to participate. A new sample was reviewed after the onsite audit. Three inmates refused to answer questions at the reassessment. The staff documented the refusal and completed the reassessment based on the information in the inmate record and from the responses at the intake assessment.

Inmate Interview – Twenty inmates interviewed were asked if medical staff asked them questions about their gender identity, sexual orientation, disabilities, feelings of vulnerability to sexual abuse, and criminal history at intake. Most could recall a nurse asking them these questions. They were then asked if another staff asked the questions a second time before they had been there a month. Inmates that had been at DC Jail for over a month said they were asked again around a month later.

g) DCSO policy 509 Inmate Classification requires the inmate to be reassessed due to a referral, request, incident of sexual abuse, or when additional information is received that impacts the inmate's risk of victimization or abusiveness.

	h) DCSO policy 509 Inmate Classification states inmates cannot be disciplined for not answering questions or disclosing information regarding disabilities, sexual orientation, previous victimization, or their own perception of vulnerability. i) DCSO policy 509 Inmate Classification requires information gathered in completion of the assessment or reassessment to be limited to staff that need to know based on safety and security of the facility to ensure the information is not exploited to the detriment of the inmate. Based on the information from interviews, policies and documents reviewed, it has been determined DCSO meets all provisions of the standard.
--	---

115.42 Use of screening information	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 713 Inmate Classification states “Housing, bed, work and program assignments should be made to separate inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.” PREA Coordinator Interview – The PREA Coordinator said the classification staff do not assign inmates determined to be high risk for abusiveness to program and work assignments where there are inmates with a high risk for victimization. Risk Screening Staff Interview – The Corrections Clerk said she reviews the risk assessment results for inmates when assigning a job or program assignment. Inmates that are at a high risk for abusiveness are not placed in assignments with inmates that are high risk for victimization. b) DCSO policy 713 Inmate Classification states “Determinations on how to ensure the safety of each inmate shall be individualized to that specific inmate. Housing, bed, work and program assignments should be made to separate inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.” Risk Screening Staff Interview – The Corrections Clerk interviewed said the results of the risk assessments for each inmate is considered when making housing, work, and program assignments. Inmates that are high risk for abusiveness are not housed in the same cell block or bunk area with inmates at high risk for victimization. Jail Director Interview – The Jail Director said a “grease board” system is used in the Jail Management System that shows the PREA assessment outcome for each inmate by housing and bed location. Red denotes risk for abusiveness, green is for risk of victimization and yellow is neutral or no risk. Staff can quickly see what the PREA status is for every inmate when they have to move an inmate or give an inmate an

	initial bed assignment. PREA Coordinator Interview – Inmates that are a risk for abusiveness are not housed in the same dormitory or 5 cell linear unit as an inmate that is a risk for victimization. Document review – while at the facility the Jail Director showed me the grease board screen on the JMS in his office. No inmates at risk for abusiveness were housed in the same housing unit as an inmate that is a risk for victimization. A screen shot of the grease board was sent on August 7th for review. No inmates at risk of abusiveness were housed in the same housing unit as an inmate at risk of victimization. DCSO policy and practice require individualized housing, bed, work, and program assignment decisions that separate inmates at high risk of sexual victimization from inmates at high risk of sexual abusiveness. Interviews with the PREA Coordinator, risk screening staff, and Jail Director confirmed that risk assessment results are reviewed before housing and assignment decisions are made, and that the Jail Management System uses a color-coded “grease board” to identify each inmate’s PREA risk status by housing and bed location. Document review and the JMS screen confirmed that inmates at risk of abusiveness were not housed in the same unit as inmates at risk of victimization. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	--

115.43 Protective Custody	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “Inmates at high risk for sexual victimization shall not be placed in involuntary protective custody unless an assessment of available alternatives has been made and it has been determined that there is no reasonably available alternative means of separation. Inmates may be held in involuntary protective custody for less than 24 hours while an assessment is completed.” DCSO policy 713 Inmate Classification prohibits the placement of inmates at high risk of victimization in segregation unless all alternative housing has been considered and it has been determined there is no alternative that can provide a safe placement. DCSO policy 714 Administrative Segregation states inmates in administrative segregation will received all privileges and rights unless the inmate poses a threat to safety and security of the jail and welfare of themselves and others. Restrictions will be documented. Jail Director Interview – The Jail Director said if they felt an inmate was at high risk for

	sexual abuse from the assessment at intake, they would look at all alternatives before placing the inmate in segregation. An inmate has not been involuntarily placed in segregation for high risk of victimization in the review period. b) DCSO policy 714 Administrative Segregation requires inmates in segregation to receive all privileges and rights of general population unless the inmate poses a threat to the security of the jail or well being of others. If there is any suspension or modification of privileges or program opportunities, the privileges suspended, why they are suspended and duration of the suspension is documented. Staff Who Supervise Segregation Interview - An Officer was interviewed that supervises segregation. He said inmates that are placed in segregation do not lose access to programs. When an inmate is placed in segregation it is documented in an incident report. The general practice is to keep a sexual abuse victim out of segregation. If they must involuntarily place a victim in segregation, they will look for an alternative housing placement that can provide a safe placement. Inmates in segregation are provided with tablets so they can continue with programming. They keep the same property as open population. They have few restrictions. They cannot work from segregation. Restrictions are documented on reviews. c) DCSO policy 714 Administrative Segregation requires an administrative review of an inmate's segregation by the Jail Director every 30 days. Jail Director Interview - The Jail Director said he reviews the placement in segregation at the time of placement and then every 30 days. Staff who supervise segregation Interview - The Officer interviewed said a review of an inmates placement in segregation is completed weekly. d) DCSO policy Prison Rape Elimination Act states "If an involuntary protective custody assignment is made because of a high risk for victimization, the Jail Director or authorized designee shall clearly document the basis for the concern for the inmate's safety and the reasons why no alternative means of separation can be arranged." e) DCSO policy 606 Prison Rape Elimination Act states "Every 30 days, the Jail Director shall afford each such inmate a review to determine whether there is a continuing need for protective custody." Jail Director Interview - The Jail Director said he reviews the placement in segregation at the time of placement and then every 30 days. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	---

115.51	Inmate reporting
	Auditor Overall Determination: Exceeds Standard

Auditor Discussion

a) DCSO policy 803 Prison Rape Elimination Act states “Inmates shall be provided multiple internal avenues for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.”

Inmate Interviews – Inmates said they could verbally tell any staff or call the numbers on the posters for the phone system. Most knew they could file a grievance or write to staff at the inmate kiosk or tablet. Most said their family could report for them, or they could make an anonymous report. Inmates said there were several ways they could make a report if they wanted to.

Facility Tour – During the facility tour, posters with information about how to report sexual abuse or sexual harassment were seen throughout the facility. Every cellblock had posters next to the inmate phones that were large in size and printed in red so they can be easily read. The posters provide information about how to make a report of sexual abuse or sexual harassment. The poster tells inmates they can make anonymous reports, tell any staff, submit a complaint on the inmate kiosk, file a grievance, call Westerville PD, tell family, or submit a report on behalf of another inmate. The inmate handbook also provides the same information on how to report as the posters. This auditor picked up an inmate phone and followed prompts in the message to make a report of sexual abuse. The call went through the Westerville Police Department Dispatch. This auditor asked an inmate to make a test PREA report on the kiosk. The inmate said he could make the report from a tablet in addition to the kiosk. The inmate was able to make the report in just a couple of minutes. The PREA Coordinator received the report email immediately and provided a copy of the email to the auditor on the same day.

b) DCSO policy 803 Prison Rape Elimination Act states “Inmates may also report anonymously and toll-free via the inmate phone system. The phone menu option will redirect calls to a Westerville Division of Police non-emergency line. Westerville Division of Police dispatchers will immediately forward all information collected to the PREA Coordinator or designee for investigation.” The DCSO Jail does not have inmates detained solely for civil immigration.

Inmate Interviews – Inmates were aware the number they could call goes to Westerville PD. They also said they could remain anonymous by not providing their name because they did not have to provide a pin number to make the call.

MOU Westerville Police Department – The MOU with Westerville PD was provided for review. The MOU was effective January 1, 2026, and ends December 31, 2028. In the agreement, the Westerville PD will receive reports of sexual abuse and sexual harassment from inmates at the Delaware County Jail and immediately forward the information received to the DC Jail. The inmate can choose to remain anonymous and the Westerville PD will redact any identifying information for the inmate from the report sent to the DCSO Jail. Training is provided to the Westerville PD staff covering

	PREA and how to receive reports from inmates at the DCSO Jail and how to forward the report to the Jail. The training curriculum was provided for review. Facility Tour- During the facility tour, a test call was placed on the inmate telephones to the external reporting agency. There was no need to input an inmate ID or pin to make a report of sexual abuse. There was a voice prompt that told me to select the language of English or Spanish, then select a number to make a report of sexual abuse. I selected that number and the phone rang. It was answered by a dispatch staff at the Westerville PD. The person said if an inmate makes a report, WPD would immediately provide the information to the DCSO. c) DCSO policy 802 PREA Coordinated Response Plan states “Staff shall accept reports made verbally, in writing, anonymously or from third parties, and shall promptly document all verbal reports.” Staff Interviews – Staff said they were required to receive a report from an inmate verbally or in writing or from third parties (family and friends). All staff were aware they are required to document any report of sexual abuse and sexual harassment from an inmate as soon as possible or prior to leaving their shift. d) DCSO policy 802 PREA Coordinated Response Plan states all staff shall be able to privately report allegations or suspicions of sexual abuse and sexual harassment of inmates to any supervisor, the Jail Director, Assistant Jail Director or Human Resources. Staff Interviews –Staff were asked how they could make a private report. They said they could go directly to their supervisor, the PREA Coordinator or the Jail Director. Some also knew they could make a report through the number on the DCSO website. DCSO policies and facility practices provide inmates with multiple internal and external ways to privately report sexual abuse, sexual harassment, retaliation, or staff neglect, including verbal and written reports to staff, grievances, kiosk or tablet submissions, anonymous reports, third-party reports, and toll-free calls to the Westerville Police Department without requiring an inmate PIN. Interviews, facility tour observations, posted notices, handbook information, the external reporting MOU, and test reports confirmed that inmates are informed of these reporting options, can access them easily, and may remain anonymous. Staff interviews also confirmed that staff accept verbal, written, anonymous, and third-party reports, promptly document them, and have private avenues to report allegations or suspicions to supervisors, the PREA Coordinator, Jail Director, Assistant Jail Directors, Human Resources, or through the DCSO website. Based on the information from the tour, interviews, policies and documents reviewed, it has been determined the facility exceeds the standard.
--	--

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard

Auditor Discussion

a) DCSO reported on the pre-audit questionnaire that they have administrative procedures for dealing with inmate grievances regarding sexual abuse.

b-c) DCSO policy 805 Inmate Grievances states "Inmates may submit a grievance regarding sexual abuse at any time and no time limit shall be imposed on an inmate." The policy does not require an inmate to informally resolve a grievance with staff or submit a grievance to a supervisor that is the subject of the complaint. The policy states "Nothing in this section shall restrict the Office's ability to defend against a lawsuit on the ground that the applicable statute of limitations has expired."

d) DCSO policy 805 Inmate Grievances requires the Jail Director or designee ensure grievances reporting sexual abuse be investigated and resolved in 90 days. The 90 days does not include time the inmate used to prepare an appeal. The Jail Director may grant an extension for up to 70 days if needed to make a decision. The inmate will be notified of the extension and the date a decision must be made. If at any level the inmate does not receive a response in the allotted time, including extensions, the inmate can consider no response a denial at that level.

The facility reported on the pre-audit questionnaire there were no grievances regarding sexual abuse during the review period. None of the investigations reviewed were reported through grievance.

e) DCSO policy 805 Inmate Grievances allows for a third party, including other inmates, family, attorneys and outside advocates to assist inmates in filing grievances and to file the grievance on their behalf if the inmate agrees to it. Staff receiving the grievance filed by a third party are required to ask the inmate if they wish to have the grievance processed and document the inmate's decision.

f) DCSO policy 805 Inmate Grievances allows any inmate who believes they are in substantial risk of imminent sexual abuse to file an emergency grievance. The supervisor is required to determine whether immediate action is reasonably necessary to protect the inmate and shall provide an initial response within 48 hours. The Supervisor is required to forward the emergency grievance to the Jail Director, who will investigate and issue a final decision within five calendar days. The initial and final response will be documented and include a determination if the inmate is at substantial risk of imminent sexual abuse and what actions were taken.

There were no emergency grievances reporting a substantial risk of imminent sexual abuse filed during the review period as reported on the pre-audit questionnaire.

g) DCSO policy 805 Inmate Grievances allows for inmates to be disciplined for filing a false grievance related to alleged sexual abuse only when it is determined the inmate filed the grievance in bad faith.

DCSO policy and practice establish procedures for handling inmate grievances related to sexual abuse, including allowing grievances to be submitted at any time without a filing deadline, without requiring informal resolution, and without requiring

	submission to the staff member who is the subject of the complaint. The policy requires sexual abuse grievances to be investigated and resolved within established tconsent andllows appropriate extensions with inmate notice, permits third parties to assist with or file grievances on an inmate's behalf with the inmate's consent, and provides an emergency grievance process for inmates who believe they are at substantial risk of imminent sexual abuse. The facility reported no sexual abuse grievances or emergency grievances during the review period, and policy permits discipline for false grievances only when the grievance was filed in bad faith. Based on information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	--

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Delaware County Sheriff's Office policy 803 Prison Rape Elimination Act states "This Office provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including a toll-free hotline number for Helpline of Delaware County, and, for persons detained solely for civil immigration purposes, immigration services agencies. This Office shall enable reasonable communication between inmates and these organizations, in as confidential a manner as possible. Inmate Interviews -Inmates said they were told about services for victims, or they have seen a poster about an outside organization that provides services to victims. Some said they didn't pay attention to it because they don't need it and could not remember. Tour Observations - Large PREA posters included information about victim support services. Instructions for calling HelpLine were provided. b) DCSO policy 803 Prison Rape Elimination Act states "Inmates shall be informed of the extent to which these communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws." DCSO policy 1207 Inmate Mail states "Mail or correspondence originating from the Helpline of Delaware County shall be opened and inspected in the presence of the inmate to intercept contraband." Inmate Handbook - The Inmate Handbook was provided for review. The PREA section on page 19 contained information about how victims of sexual abuse can access the Helpline to request victim advocate services. Inmates are informed the calls are confidential, toll free and anonymous.

	PREA Brochure – The PREA brochure provided to inmates at booking has a paragraph for additional resources. This section tells inmates about the confidential support services through the HelpLine that can be contacted by following the prompt on the inmate phone. Calls are at no cost, services are free and confidential. c) DCSO policy 803 Prison Rape Elimination Act states “This Office shall enter, or attempt to enter, into a memorandum of understanding with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. This Office shall maintain copies of written agreements, or documentation of attempts to enter into such agreements.” Victim Advocate MOU – The Delaware County Jail provided a copy of an MOU with HelpLine, a victim advocate organization, to provide victim advocate services to inmates at DCJ. The MOU is effective from July 16, 2024 until September 16, 2026. In the MOU, HelpLine agrees to provide emotional support services to inmates at DC Jail that are prior victims of sexual abuse through a hotline, provide victim advocate services at forensic examinations at the hospital, and provide supports services during investigative interviews at the DC Jail when requested. Victim Advocate Interview – This auditor called the 800 number for the HelpLine. This auditor spoke to a HelpLine staff that verified HelpLine would provide a victim advocate if requested at the hospital for the forensic exam. If an inmate requests a victim advocate to be present during the investigator interview, the HelpLine could send a victim advocate from their SARN to be with the victim during the interview. The staff verified when an inmate calls the HelpLine, the staff will provide emotional support on the phone and arrange for a victim advocate from their SARN to contact the DCSO administration to arrange for a meeting at the jail with the victim. DCSO policies, inmate materials, posters, and the victim advocate MOU establish that inmates have access to outside emotional support services through HelpLine of Delaware County, including toll-free and confidential telephone access, mail contact, victim advocate support during forensic examinations, and advocate support during investigative interviews when requested. Inmates are informed of these services through the handbook, PREA brochure, facility postings, and phone instructions, and communications are handled in as confidential a manner as possible while advising inmates of monitoring and mandatory reporting limits. Interviews and the HelpLine verification confirmed that advocates are available to provide emotional support by phone, respond to hospitals for forensic exams, attend investigative interviews, and coordinate in-person victim support at the jail when requested. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	--

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard

	Auditor Discussion Delaware County Sheriff's Office policy 803 Prison Rape Elimination Act states "This office shall accept any third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. These reports must be referred for investigation. Information shall be available on the agency webpage, www.delawarecountysheriff.com, and posted in the facility lobby and visitation area" Facility Tour – During the facility tour, Zero Tolerance signs that provide information on how to report sexual abuse and sexual harassment were observed throughout the facility including the area visitors enter at the main entrance and in the hallway where the no-contact visiting rooms were located. The signs had red lettering that made them stand out and were printed in large enough print that was easy to read. The signs told family or friends why they should make a report and how to report through any staff, calling or emailing the PREA coordinator at the phone number and email address provided. DCSO Webpage – This auditor viewed the DCSO webpage at https://sheriff.co.delaware-oh.us/prea/ and found information for third party reporting. Inmate Interviews – inmates said their family could make a report for them to the phone number and email on the posters they see. Based on the information from the facility tour, interview and policies reviewed, it has been determined the facility meets the standard.
--	--

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard Auditor Discussion a) Delaware County Sheriff's Office policy 803 Prison Rape Elimination Act states "All staff are required to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in any facility. Staff are also required to report any 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." The policy reflects the requirements of the standard. Staff Interviews – Staff said they are required to immediately report any suspicion as well as all knowledge of an incident of sexual abuse and sexual harassment. Staff said they also must report possible retaliation against the alleged victim, witnesses or staff, and any staff neglect related to an incident of sexual abuse. b) Delaware County Sheriff's Office policy 803 Prison Rape Elimination Act states

"Sexual abuse and sexual harassment reports shall only be made available to those who have a legitimate need to know, and in accordance with this policy and applicable law." The policy reflects the requirements of the standard.

Staff Interviews – Staff said they can only share information about a report of sexual abuse or sexual harassment with the staff that need to know for response or investigation, such as their immediate supervisor, the PREA Coordinator, Facility Investigators, Assistant Jail Directors or the Jail Director.

c) Delaware County Sheriff's Office policy 606 Prison Rape Elimination Act states "Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse under the same requirements of facility staff, and are required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services." The policy reflects the requirements of the standard.

Medical Staff Interview – A Nurse was interviewed and asked if she is required to report to investigators any information an inmate tells her about a possible incident of sexual abuse or sexual harassment that occurred in an institution and if the inmates are notified of that duty to report. If the incident occurred in the community she could not tell anyone until the inmate signs a release of information. She said the inmates sign a Patient Consent for Treatment form at intake that notified the inmate of their duty to report and she would tell them again at the time they tell her about the incident.

Mental Health Staff Interview – A Behavioral Health staff said she is required to report to investigators any information an inmate tells her about a possible incident of sexual abuse or sexual harassment that occurred in an institution. She said the inmates are notified of that duty to report at intake. She said she tells inmates at the beginning of treatment about her duty to report any information the inmate may tell her about an incident of sexual abuse or sexual harassment.

Document Review – Six Patient Consent for Treatment forms were reviewed that inmates signed at intake to the jail. The forms have a paragraph that informs the inmate of the duty to report for medical and mental health staff any information regarding an incident of sexual abuse or sexual harassment that may have occurred in the Delaware County Jail or any other institution.

d) Delaware County Sheriff's Office policy 606 Prison Rape Elimination Act states "If the alleged victim is under the age of 18 or is considered a vulnerable adult under a state or local vulnerable persons statute, this facility shall report the allegation to the designated state or local services agency under applicable mandatory reporting laws." The policy reflects the requirements of the standard.

Research of the Ohio State Law found that abuse of vulnerable adults is to be reported to the Ohio Adult Protective Services and if the inmate is under 18 there is mandatory reporting to Child Protective Services.

e) DCSO policy 606 Prison Rape Elimination Act states "This facility shall report

	all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the designated investigators.” The policy reflects the requirements of the standard. Facility Head Interview – The Jail Director said all allegations of sexual abuse and sexual harassment are referred to designated facility investigators for an administrative investigation. If there is a potential criminal violation, the allegation is referred to Detectives in the Sheriff’s Office for criminal investigation. Document Review – Three investigations completed during the review period were provided for review. All three reports were sexual harassment that were referred to administrative investigators. Two reports were made on the inmate Kiosk and one was a verbal report directly to staff. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	---

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion action to protect the inmate.” Document review - There were no incidents found of a report of substantial risk of imminent sexual abuse where staff had to respond immediately during the review of investigations. Agency Head Interview – The Sheriff said if an inmate is in substantial risk of imminent sexual abuse, the staff will take action immediately to protect that person. The jail could move the alleged perpetrator to segregation if the victim is safe in population. If the victim is not safe, they would place the victim in segregation. If the victim cannot be placed back in open population, the jail can consider a transfer to a jail that DCSO has a contract with for reciprocal housing that is PREA compliant. Jail Director Interview – The Jail Director said if an inmate is determined to be a substantial risk of imminent sexual abuse, the staff are required to immediately separate the victim from the threat. This can be done by placing the inmate posing the threat in segregation, moving the victim to another general population placement or moving the victim to segregation. This would be done on a case-by-case basis. If staff are posing a threat to an inmate, the staff can be placed on suspension pending investigation. Staff Interview – Staff were asked what their response process would be if they became aware an inmate was in substantial risk of imminent sexual abuse. All staff said they would immediately separate the victim from the perpetrator and notify their

	supervisor. They would keep the victim with them and move them to a safe area such as booking. They would then contact their supervisor and await instructions or relief from other security staff. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	--

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-c) DCSO policy 803 Prison Rape Elimination Act states “If there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Jail Director shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation (28 CFR 115.63 a; 28 CFR 115.63 b). The Jail Director shall ensure that the notification has been documented.” The policy reflects the requirements of the standard. Jail Director Interview – If they receive a report about an incident of sexual abuse that occurred at another facility, he will send the information reported by the inmate in a letter or email to the other facility head within 72 hours. Email documents the date the other facility head is notified. Document Review – The facility provided two emails regarding reports from inmates at the Delaware County Jail for incidents that happened at another institution. The emails documented the information was provided to the other institution within 72 hours of being reported to staff at DCJ. d) DCSO policy 803 Prison Rape Elimination Act states “If the Jail Director receives notification from the head of another facility that there is an allegation that an inmate was sexually abused or harassed while he/she was confined at the Delaware County Jail, the Jail Director shall ensure that the allegation is investigated in accordance with PREA Standards.” The policy reflects the requirements of the standard. The facility reported on the pre-audit questionnaire receiving one report of a sexual abuse incident that occurred at DCSO Jail. The incident had already been investigated from when the inmate was housed at DCSO Jail. An email response to the other facility was provided. DCSO policy requires the Jail Director to notify the head of another facility within 72 hours when an inmate reports sexual abuse that allegedly occurred while confined at that other facility, and to document the notification. The Jail Director described sending the reported information by letter or email, and document review confirmed two notifications were made to other institutions within the required timeframe. DCSO

	policy also requires allegations received from another facility involving conduct at the Delaware County Jail to be investigated under PREA standards, and the facility documented one such notification that had already been investigated while the inmate was housed at DCSO Jail, with an email response provided to the reporting facility. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	---

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 802 PREA Coordinated Response Plan provides the procedures for the initial response from security staff in section 602.3. The policy requires the first officer to respond to separate the victim from the abuser, protect the scene to preserve evidence, provide instructions to the victim and inmate abuser that can protect physical evidence. The policy reflects the requirements of the standard. Staff Interviews – Staff said they would take the inmate to a safe place, immediately contact their supervisor and the shift supervisor, prevent the victim from destroying evidence by not allowing the victim to shower, change clothes, eat, drink, brush teeth, or go to the bathroom. The facility reported on the pre-audit questionnaire no incidents of sexual abuse being received during the review period. There was no sexual abuse investigations completed during the last 12 months. b) DCSO policy 803 Prison Rape Elimination Act states “If the initial staff member responding is not a corrections officer, the staff member shall request the alleged victim to refrain from any actions that could destroy physical evidence and then immediately notify a corrections officer.” The policy reflects the requirements of the standard. DCSO policy 602 PREA Coordinated Response Plan states “If the staff member who first becomes aware of an incident of sexual abuse is not a corrections officer, they must request the victim not take any action that may destroy evidence, and immediately notify a corrections officer.” The policy reflects the requirements of the standard. Staff Interview - Non-security staff interviewed said they would notify the Shift Supervisor, who is a custody staff member, if an inmate made a report of sexual abuse to them. Non-security staff said they would instruct the victim not to shower, change clothes, eat, drink, brush teeth, or go to the bathroom to protect evidence.

	DCSO policies establish clear first responder procedures for responding to allegations of sexual abuse, requiring security staff to separate the alleged victim from the abuser, protect the scene, preserve physical evidence, and instruct both the alleged victim and alleged abuser not to take actions that could compromise evidence. Staff interviews confirmed that security staff understand their responsibility to move the victim to a safe location, immediately notify supervisors, and prevent actions such as showering, changing clothes, eating, drinking, brushing teeth, or using the bathroom. Non-security staff interviews also confirmed they are trained to notify custody staff immediately and provide the same evidence-preservation instructions, and the facility reported no sexual abuse incidents or investigations during the review period. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	---

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion DCSO policy 802 PREA Coordinated Response Plan provides the procedures for staff to follow for response to a report of sexual abuse. The plan provides responsibilities for first responders, supervisors, health care staff, mental health staff, and investigators. The plan was reviewed and found to provide detailed information for staff response if an inmate reports sexual abuse at all levels from line staff to supervisors. The plan covers the responsibilities of first responders, investigators, medical and mental health staff and supervisors. Jail Director Interview – The Jail Director said the facility has a written plan that provides staff with information on how to respond to a report of sexual abuse. The plan provides information to first responders, shift supervisors, medical and mental health staff, and investigators. The plan also covers access to victim advocates if requested by the inmate. Based on the information from interview and policy reviewed, it has been determined the facility meets the standard.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion a) Delaware County Sheriff’s Office policy 803 Prison Rape Elimination Act states

	“The Office shall not enter into or renew any labor agreement or other agreement that limits the office’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.” DCSO policy 109 Personnel Complaints allow the Sheriff’s Office to temporarily place staff on administrative leave if a complaint of misconduct is of a serious nature or if allowing the staff to continue to work would adversely affect the mission of the Office. Agency Head Interview – The Sheriff said there are two union agreements in place for staff in the Jail. Neither agreement prohibits the Jail Director from separating staff from an inmate that has reported sexual abuse committed by the staff. Union Agreements – Two labor agreements were provided for review. One allowed the Sheriff to suspend staff prior to a meeting to review staff misconduct or policy violation if the staff’s continued employment poses a danger to the persons or property or a threat of disrupting operations. The other did not have a specific clause that allows the removal of staff when there is a pending investigation, however OR 124.388 Administrative Leave allows the appointing authority to place an employee on administrative leave with pay where the safety of any person entrusted to the employee’s care could be adversely affected. Thought the Ohio Code allows for any employee in Ohio to be placed on administrative leave, it is recommended that the labor agreement have this language added at the next renewal. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	--

115.67 Agency protection against retaliation	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “All inmates and staff who report sexual abuse or sexual harassment, or who cooperate with sexual abuse or sexual harassment investigations, shall be protected from retaliation.” DCSO policy 902 PREA Coordinated Response Plan states “The Jail Director or designee shall assign a supervisor to monitor the conduct and treatment of inmates or staff who report sexual abuse or sexual harassment, as well as inmates who reported to have suffered sexual abuse.” The policies reflect the requirements of the standard. b) DCSO policy 803 Prison Rape Elimination Act states “Protective measures, including housing changes, transfers, removal of alleged abusers from contact with victims, administrative reassignment or reassignment of the victim or alleged perpetrator to another housing area, and support services for inmates or staff who

fear retaliation, shall be utilized.”

Agency Head Interview – The Sheriff said to protect inmates from possible retaliation they can move the inmate or staff that may be suspected of retaliating away from the inmate being monitored. If staff are suspected of retaliation, they can reassign the staff or suspend the staff depending on the circumstances. They would only move the inmate being monitored as a last resort to keep his or her safe.

Facility Head Interview – The Jail Director said if the inmate being monitored believes they are being subjected to retaliation, He can have the inmate that is retaliating or reassign or suspend staff to remove them from being around the inmate. Moving the inmate being monitored is a final measure to keep them safe.

Staff Designated to Conduct Retaliation – A sergeant that is a Facility Investigator designated to monitor for retaliation was interviewed. She said if there is suspected retaliation, the inmate or staff suspected of retaliating can be moved away from the inmate being monitored. She would conduct an investigation of the alleged retaliation. She talks to the inmate to ask about possible retaliation, reviews housing changes and discipline for possible retaliation.

c-d) DCSO policy 802 PREA Coordinated Response Plan provides procedures for inmate safety and protection. The policy states “Status checks shall occur at the two week, 30 day, 60 day, and 90 day mark from the date of the allegation/complaint.” The policy allows the monitoring to continue beyond 90 days if needed.

Staff Designated to Conduct Retaliation – The Sergeant interviewed said she meets with the inmates being monitored at 2 weeks, 30 days, 60 days and 90 days from the inmate reporting the sexual abuse. She said the monitoring can go beyond 90 days if needed based on circumstances that require it.

Document Review – There were no reports of sexual abuse during the review period, therefore there were no documented periodic meeting for retaliation monitoring to review. The retaliation monitoring form documents the actions taken and areas reviewed at each periodic meeting with the inmate.

e) DCSO policy 803 Prison Rape Elimination Act states “If any other individual who cooperates with an investigation expresses a fear of retaliation, the facility shall take reasonable measures to protect that individual against retaliation.”

Agency Head Interview – The Sheriff said if an inmate that cooperates with an investigation of sexual abuse expresses fears of retaliation the Jail can move an inmate that is retaliating away from the victim. If it is staff, the Jail can assign the staff to a different post or put them on temporary suspension depending on the circumstances.

Facility Head Interview - The Jail Director said if an inmate is suspected of retaliating against an inmate victim, the inmate can be moved. Staff can be assigned away from the inmate or placed on a temporary suspension if the circumstances require it. In either case an investigation would be conducted.

	f) DCSO policy 803 Prison Rape Elimination Act states “Monitoring may terminate if the investigation indicates the allegation is unfounded.” DCSO policies require inmates and staff who report sexual abuse or sexual harassment, cooperate with investigations, or are identified as victims to be protected from retaliation. The policies require a supervisor to monitor inmates and staff for retaliation, provide protective measures such as housing changes, transfers, removal of alleged abusers from contact with victims, staff reassignment or suspension, and support services when retaliation concerns are identified. Interviews confirmed that facility leadership and the designated retaliation monitor understand the available protective measures, that monitoring occurs at two weeks, 30 days, 60 days, and 90 days and may continue longer if needed, and that monitoring may end if an allegation is determined to be unfounded; however, there were no sexual abuse reports during the review period requiring completed retaliation monitoring records. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	---

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion DCSO policy 803 Prison Rape Elimination Act requires any use of segregated housing to protect an inmate that has reported sexual abuse to be subject to the same requirements for 115.43. Jail Director Interview – The Jail Director said if they felt an inmate was at high risk for sexual abuse after reporting an incident of sexual abuse, they would look at all alternatives before placing the inmate in segregation. Staff who supervise Segregation Interview – An Officer was interviewed that supervises segregation. He said inmates that are placed in segregation do not lose access to programs. When an inmate is placed in segregation it is documented in an incident report. The general practice is to keep a sexual abuse victim out of segregation. If they must involuntarily place a victim in segregation, they will look for an alternative housing placement that can provide a safe placement. Inmates in segregation are provided with tablets so they can continue with programming. They keep the same property as open population. They have few restrictions. They cannot work from segregation. Restrictions are documented on reviews. The facility reported on the pre-audit questionnaire that no inmates were placed involuntarily in segregation for reporting sexual abuse during the review period. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act requires a prompt, thorough and objective investigation of all allegations of sexual abuse and sexual harassment. DCSO policy 802 PREA Coordinated Response states “All reports of sexual abuse and sexual harassment shall be promptly, thoroughly, and objectively investigated.” The policy reflects the requirements of the provision. Administrative Investigator Interview –The Administrative Investigator said an investigation is initiated immediately. If a report is a potential criminal violation, the criminal investigation is started immediately, and she waits to start the administrative investigation when the Detective says she can proceed. She said anonymous and third-party reports are investigated the same as any other report based on the information provided. Criminal Investigator Interview – An interview was conducted with a DCSO Detective that investigate sexual abuse allegations that may be criminal law violations. He said the PREA Coordinator immediately notifies him of a sexual abuse incident, and he initiates an investigation the same day or the next day depending on the circumstances. Anonymous and third-party reports are immediately investigated the same as other reports. Investigation File Review – A review of three sexual harassment investigations completed in the last 12 months found that investigations were initiated as soon as the allegation was reported. There were no investigations initiated based on anonymous allegations. There were two investigations of sexual harassment that were reported by a third-party. All investigations were thoroughly documented. An incident report was provided for an allegation of sexual harassment that was partially documented as an administrative investigation but did not provide the specific information about the alleged harassment. The facility was asked to have the staff revise the incident report with more detail to determine if an investigation was required. The revised incident report indicated there was no harassment directed at the two inmates. No investigation was required based on the additional information. b) DCSO policy 802 PREA Coordinated Response states “Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases.” The policy reflects the requirements of the provision. All investigators have received the specialized training required in standard 115.34 based on the training document review in that standard. Jail staff that conduct administrative investigations have also completed the required annual PREA training. c) DCSO policy 802 PREA Coordinated Response states “Investigators shall

gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.” The policy reflects the requirements of the provision.

Administrative Investigator Interview – The Facility Administrative Investigator was asked to describe the investigation process. She said she reviews the information from the initial report and then interviews the alleged victim. If there is a potential criminal violation, the DCSO Detectives are notified and begin a criminal investigation. She will wait for the DCSO Detective approval to begin the administrative investigation. Based on information gathered, she may review video evidence or interview potential witnesses. If there is physical evidence, she would protect it until a criminal investigator can complete the collection. She would then conduct an interview with the suspected perpetrator.

Criminal Investigator Interview – A DCSO Detective that conducts criminal investigations said the administrative investigator or PREA Coordinator would request a criminal investigation once it is determined there may be a criminal law violation. He interviews the alleged victim, potential witnesses and suspected perpetrator. If there is an alleged sexual assault within a time frame that allows for DNA evidence collection, he will arrange for a forensic exam if the victim consents. He would collect the DNA kit from the hospital and follow a chain of evidence to place it in proper storage. He said if there is potential physical evidence at the scene, he will have staff protect it until he can collect the evidence.

d) DCSO policy 802 PREA Coordinated Response states “When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.” The policy reflects the requirements of the provision.

Criminal Investigator Interview – A DCSO Detective said he would consult with the prosecutor’s office if he had to do compelled interviews with a staff or inmate subject to ensure the proper use of Garrity or Miranda.

e) DCSO policy 802 PREA Coordinated Response states “The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. Inmates alleging sexual abuse shall not be required to submit to a polygraph examination or other truth telling device as a condition for proceeding with an investigation.” The policy reflects the requirements of the provision.

Both investigative staff interviewed said credibility of an inmate victim, inmate witness or inmate suspect is not based on their status as an inmate. Credibility is determined based on the individual history review. The DCSO Detective said he would never subject the victim to a polygraph exam.

f) DCSO policy 802 PREA Coordinated Response states “Administrative

investigations into reports of sexual abuse and sexual harassment shall include an effort to determine whether staff actions or failures to act contributed to the abuse. Administrative 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.” The policy reflects the requirements of the provision.

Administrative Investigation Review – A review of three administrative investigations of sexual harassment found a very good description of testimonial evidence and the reasoning behind credibility assessments and findings. A review of staff actions or failure to act possibly contributing to the incident was documented.

g) DCSO policy 802 PREA Coordinated Response states “Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.” The policy reflects the requirements of the provision.

DCSO reported no criminal investigations during the last 12 months.

h) DCSO policy 803 Prison Rape Elimination Act states “If criminal acts are identified as a result of the investigation, the case shall be presented to the appropriate prosecutor's office for filing of new charges.” The policy reflects the requirements of the provision.

i) DCSO policy 803 Prison Rape Elimination Act states “The Office shall retain all written reports from administrative and criminal investigations pursuant to this policy for as long as the alleged abuser is held or employed by the Office, plus five years.” The policy reflects the requirements of the provision.

j) DCSO policy 802 PREA Coordinated Response states “The departure of the alleged abuser or victim from the employment or control of the Jail or office shall not provide a basis for terminating an investigation.” The policy reflects the requirements of the provision.

l) All investigations are conducted by designated staff at the Delaware County Jail or by Detectives in the Delaware County Sheriff’s Office. No outside agency is used to conduct investigations.

DCSO policies and investigative practices require all allegations of sexual abuse and sexual harassment to be investigated promptly, thoroughly, and objectively by trained investigators. Interviews and investigation file review confirmed that administrative and criminal investigations are initiated immediately, anonymous and third-party reports are handled the same as other reports, evidence is gathered and preserved, witnesses and involved parties are interviewed, credibility is assessed individually without regard to inmate or staff status, and victims are not required to submit to polygraph examinations. Administrative investigations include documentation of evidence, credibility assessments, findings, and whether staff actions or failures contributed to the incident, while criminal matters are referred for

	prosecution when supported by the evidence and records are retained as required. Based on the information from interviews, policies and documents reviewed, it has been determined that DCSO meets all provisions of the standard.
--	--

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	DCSO policy 802 PREA Coordinated Response states “All completed written investigations shall be forwarded to the Jail Director or, if the allegations may reasonably involve the Jail Director, to the Chief Deputy. The Jail Director or Chief Deputy shall review all administrative investigations and determine whether any allegations of sexual abuse or sexual harassment have been substantiated by a preponderance of evidence.” Investigator interview – A Facility Investigator that conducts administrative investigations said the standard for evidence to substantiate a case in an administrative investigation is preponderance of evidence. She said that fifty-one percent of the evidence proves the incident occurred as reported by the victim. Investigation File Review – Three administrative investigations were reviewed. All outcomes appeared to be following the preponderance of evidence standard in determining the outcome. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “The Jail Director or the authorized designee shall inform a victim inmate in writing whether an allegation has been substantiated, unsubstantiated or unfounded.” Investigative Staff Interview – A staff that conducts administrative investigations said she verbally informs the victim of the outcome for an investigation and then documents that she informed the inmate in case notes in the Jail Management System.

	b) DCSO policy 803 Prison Rape Elimination Act states “If a staff member is the accused (unless the Office has determined that the allegation is unfounded), the inmate shall also be informed whenever (28 CFR 115.73 c): (a) The staff member is no longer assigned to the inmate’s unit or employed at the facility. (b) The Office learns that the staff member has been indicted or convicted on a charge related to sexual abuse within the facility.” There were no incidents of staff sexual abuse that required a notification of investigation outcome during the review period. c) DCSO policy 803 Prison Rape Elimination Act states “If a staff member is the accused (unless the Office has determined that the allegation is unfounded), the inmate shall also be informed whenever (28 CFR 115.73 c): (a) The staff member is no longer assigned to the inmate’s unit or employed at the facility. (b) The Office learns that the staff member has been indicted or convicted on a charge related to sexual abuse within the facility.” There were no incidents of inmate sexual abuse that required a notification of investigation outcome during the review period. d) DCSO policy 803 Prison Rape Elimination Act states “If another inmate is the accused, the alleged victim shall be notified whenever the Office learns that the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility.” e) DCSO policy 803 Prison Rape Elimination Act states “All notifications or attempted notifications shall be documented (28 CFR 115.73 e). When notification is made while the inmate is in custody, the inmate will sign a copy of the notification letter. The letter will be added to the case file.” f) DCSO policy 803 Prison Rape Elimination Act states “If the inmate is no longer in custody of this facility, any attempts to make notification shall be documented in the JMS and a copy maintained in the investigative case file.” Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	---

115.76 Disciplinary sanctions for staff	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “Staff shall be subject to disciplinary sanctions, up to and including termination, for violating this policy.” b) DCSO policy 803 Prison Rape Elimination Act states “Termination shall be the presumptive disciplinary sanction for staff members who have engaged in sexual

	abuse,” c) DCSO policy 803 Prison Rape Elimination Act states “All discipline shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories.” d) DCSO policy 803 Prison Rape Elimination Act states “All terminations for violations of sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to the law enforcement agency that would handle any related investigation and to any relevant licensing bodies.” Investigation File Review – there were no substantiated sexual abuse or sexual harassment investigations involving staff or staff resignations during an investigation during the review period. DCJ reported no staff being terminated or disciplined short of termination for incidents of sexual abuse or sexual harassment during the review period. Based on information from policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	---

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion DCSO policy 803 Prison Rape Elimination Act states “Any contractor or volunteer who engages in sexual abuse within the facility shall be immediately prohibited from having any contact with inmates. He/she shall be promptly reported to the law enforcement agency that would investigate such allegations and brought to the attention of any relevant licensing bodies.” DSCSO policy 316 Volunteers states “A volunteer may be removed from the volunteer program at the discretion of the program manager or the authorized designee.” DSCO policy 116 Standards of Conduct – Contractor and Non-Member prohibits personal or unofficial business relationships with an current inmate or an inmate who has been discharged, their family members, or known associates unless written permission is received from the Jail Director. Contractors and non-members are strictly prohibited from “engaging in on-duty sexual activity including but not limited to sexual intercourse, excessive displays of public affection, or other sexual contact with members, volunteers, contractors, or inmates.” The facility reported in the pre-audit questionnaire that no volunteers or contractors were involved in investigations of sexual abuse during the review period. A review of

	the investigation files found no allegations of sexual abuse or sexual harassment against a volunteer or contractor. Facility Head Interview – The Jail Director said there were no allegations against a volunteer or contractor during the last 12 months. He said if a volunteer or contractor were alleged to have committed sexual abuse or sexual harassment against an inmate, they may be suspended from entry. If the allegation is substantiated, the volunteer or contractor would be permanently prevented from entering the facility. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.
--	--

115.78 Disciplinary sanctions for inmates	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a. The DCSO policy 806 Inmate Discipline states “Inmates shall be subject to disciplinary sanctions pursuant to the 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.” Document Review – There were two substantiated findings for inmate sexual harassment in an administrative investigation during the review period. Both resulted in the inmate perpetrator receiving a discipline write up and going through the disciplinary hearing process. One inmate was sanctioned to segregation. b. The DCSO policy 806 Inmate Discipline states “Sanctions shall be commensurate with the natures and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.” Jail Director Interview – The Jail Director said an inmate will be sanctioned based on the circumstances of the offense, sanctions for similar incidents, the inmate’s discipline history, and other mitigating factors. c. The DCSO policy 806 Inmate Discipline states “The disciplinary process shall consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.” Jail Director Interview – The Jail Director said if an inmate perpetrator of sexual abuse has mental health issues, this can be taken into consideration as a mitigating factor for disciplinary sanctions. Document Review – One inmate received a disciplinary write up for sexual harassing other inmates. The disciplinary hearing considered mitigating circumstances from behavioral health in the finding.

	d. The DCSO policy 806 Inmate Discipline states “If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.” Mental Health Staff Interview – Mental Health staff said she could provide therapy to inmate perpetrators of sexual abuse that would focus on the triggers for the behavior and the inmate can deal with the triggers to prevent the behavior. She said refusal would not prevent the inmate from participating in other programming. e. The DCSO policy 806 Inmate Discipline states “The Jail Director or designee may discipline an inmate for sexual contact with staff only upon a finding that the staff did not consent to such contact.” Investigation Case Review – Documentation of an incident of an inmate exposing himself to staff where the staff did not consent was provided. The inmate was disciplined for their behavior. f. The DCSO policy 806 Inmate Discipline states “For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.” The policy reflects the standard. g. DCSO policy 806 Inmate Discipline allows the Jail Director or designee to prohibit all sexual activity between inmates and discipline inmates for such activity unless the activity is determined to be coerced. Document Review – The Inmate Handbook prohibits sexual acts. Based on the interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	--

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	c) DCSO policy 713 Inmate Classification requires screening staff to offer an inmate a follow up medical/mental health screening within 14 days of reporting being a victim of prior sexual abuse on the risk screening. DCSO policy 910 Medical Response to Sexual Abuse requires a medical and mental health referral within 14 days of an inmate reporting prior victimization at risk assessment.

The DCSO risk assessment process begins when a Nurse asks inmates the questions to complete the risk assessment at intake in the booking area. If an inmate reports prior victimization at the risk assessment interview, a mental health referral is offered by the Nurse at the Intake assessment or by the Classification Clerk at the time of the re-assessment and documented on the risk assessment form. If Referral is circled on the form, that inmate has been scheduled for a meeting with mental health. If Declined is circled, the inmate has refused treatment. The Nurse and Classification Clerk described this process during their interviews. The referral is emailed to the Mental Health staff. She then schedules an appointment with the inmate.

Risk Screening Staff Interview – The Nurse said if an inmate reports being a prior victim of sexual abuse in an institution or in the community she offers mental health services to the inmate. If accepted, she emails mental health staff to schedule the follow-up meeting. A Corrections Clerk said if an inmate reports being a prior victim at the reassessment meeting that was not reported at the intake assessment, she will offer the inmate mental health services and document it on the assessment form.

Document Review – Thirty inmates were selected for review of risk assessments that arrived at DCSO over each month of the review period. Seven inmates reported being a prior victim of sexual abuse on the intake risk assessment. An offer of mental health services was documented for five of the inmates. Two assessments had NA marked for the mental health referral. The PREA Coordinator said the two inmates were seeing medical and mental health for ongoing treatment unrelated to prior victimization. The Nurse may have thought the referral didn't need to be documented on the intake risk assessment as a result. The Corrections Clerks review the intake assessments after the Nurse completes the interview with the inmate. It was recommended that the Corrections Clerks ensure the medical and mental health referral is made regardless of the inmate seeing them for other reasons. The PREA Coordinator sent an email with instructions for Corrections Clerks to review assessments for a documented referral to mental health and medical when prior victimization is disclosed. If a prior victim does not have a documented medical /MH offer, they are to contact the Nurse to make the correction within required time frame of 14 days. The facility has a compliant system in place and documentation demonstrated substantial compliance with the standard.

d) DCSO policy 502 Health Records and Confidentiality limits access to information related to sexual victimization or abusiveness to medical and mental health practitioners and other staff that need to know for treatment plans and security, such as housing, work, education and program assignments.

Tour Observations – Medical records and investigation records were observed in a locked office and in a locked cabinet. Electronic records are in the Jail Management System that has restricted access based on the staff position. The Jail Director or designee must authorize access to medical and investigation electronic records.

e) DCSO policy 910 Medical Response to Sexual Abuse states “Medical and mental health staff shall obtain informed consent from an inmate before reporting information about prior sexual victimization that did not occur in a confinement

	setting.” Medical Staff Interview – The Nurse said if an inmate tells her about an incident of sexual abuse that occurred outside of a correction facility, she must get a release of information signed by the inmate for her to share that information with anyone. DCSO policies require inmates who report prior sexual victimization during risk screening to be offered follow-up medical and mental health services within 14 days, with referrals documented and reviewed to ensure compliance. Interviews and document review confirmed that referrals are offered by intake or classification staff, routed to mental health, and corrected when documentation is incomplete. Policies also protect confidentiality by limiting access to victimization and abusiveness information to medical, mental health, and other staff with a legitimate need to know, and require informed consent before sharing information about prior victimization that occurred outside a confinement setting. Based on the information from interviews, policies and documents reviewed, it has been determined DCSO meets the provisions of the standard.
--	--

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion a) DCSO policy 910 Medical Response to Sexual Abuse provides inmate victims of sexual abuse unimpeded, timely access to emergency medical treatment and crisis intervention services. The type of treatment and services will be determined by medical and mental health staff. DCSO policy 803 Prison Rape Elimination Act states “Inmates who are victims of sexual abuse shall be transported to the nearest appropriate location for treatment of injuries and collection of evidence, and for crisis intervention services. The nature and scope of services are determined by medical and mental health practitioners according to their professional judgment.” DCSO policy 802 PREA Coordinated Response Plan states “The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.” Medical Staff interview – The Medical Staff said a victim of sexual abuse or sexual assault would be evaluated for emergent injuries, stabilized and sent the local hospital for emergency medical services or a forensic examination based on the time

	since the incident is said to have occurred. Mental Health Staff Interview – Mental Health staff said they would provide immediate crisis intervention services and ensure the detainee victim is stable. b) DCSO policy 803 Prison Rape Elimination Act states “If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, corrections officers shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners.” Staff Interviews – All randomly selected staff were asked about first responder duties. All staff said the facility has 24-hour nursing and would not have a situation where medical staff are not on duty. All staff said they would protect the victim, notify the shift supervisor and wait for other custody staff and medical staff to respond. Some said they would take the detainee to medical if the shift supervisor requested. c) DCSO policy 910 Medical Response to Sexual Abuse requires victims of sexual abuse to be provided with prophylactic treatment and follow-up care for STI infections and/or other communicable diseases when medically necessary based on their professional judgement. d) DCSO policy 803 PREA states “Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.” Investigation File Review – there were no reports of sexual abuse that required medical treatment and mental health referral during the review period. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	--

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 910 Medical Response to Sexual Abuse states “Medical and mental health care shall be provided to all inmates who have been victimized by sexual abuse in any confinement setting.” b) DCSO policy 910 Medical Response to Sexual Abuse states “This care shall include: (a) Evaluation and follow-up services and treatment plans (28 CFR 115.83 a). (b) Referrals for continued care following transfer or release from custody (28 CFR 115.83b).” Medical Staff Interview – The Nurse interviewed said that an inmate victim would be

offered a mental health referral, medical monitoring and treatment of wounds or injuries, and access to medications for STI. If the inmate is getting released during that follow up treatment, she can make a referral for community services.

Mental Health Staff Interview – The mental health staff interviewed said mental health follow up services and treatment would be provided to the inmate victim of sexual abuse. Referral could be made to outside services upon release.

c) DCSO policy 803 Prison Rape Elimination Act requires sexual abuse victims to be offered medical and mental health services in a timely manner and consistent with the community level of care.

Medical Interview – The Nurse said the medical services provided to a victim of sexual abuse are the same as the services provided in the community.

Mental Health Staff Interview – The mental health staff said the mental health services provided to a victim are similar to the services offered in the community.

d) DCSO policy 803 Prison Rape Elimination Act states “Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.”

Medical Staff Interview – The Nurse said female detainees would be provided pregnancy testing as medically necessary and information about pregnancy medical services. She said the DCSO can make referral to pregnancy services if the inmate is being released.

e) DCSO policy 803 Prison Rape Elimination Act states “If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services.”

f) DCSO policy 803 Prison Rape Elimination Act states “Victims of sexual abuse while in a confinement setting shall be offered medical and mental health evaluations and, as appropriate, treatment.”

g) DCSO policy 803 Prison Rape Elimination Act states “Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident”

Investigation File Review – there were no reports of sexual abuse that required medical treatment and mental health referral during the review period.

DCSO policies require ongoing medical and mental health care for inmates who report sexual abuse in a confinement setting, including evaluation, follow-up services, treatment plans, referrals upon release or transfer, pregnancy-related services when applicable, and treatment at no cost regardless of participation in an investigation. Medical and mental health staff interviews confirmed that services would be provided consistent with community care, with referrals available for continued support after release. No sexual abuse reports requiring medical treatment or mental health referral occurred during the review period.

Based on the information from interviews, policies and documents reviewed, it has

	been determined the facility meets the provisions of the standard.
--	--

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “An incident review shall be conducted at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded.” b) DCSO policy 803 Prison Rape Elimination Act states “The review should occur within 30 days of the conclusion of the investigation.” c) DCSO policy 803 Prison Rape Elimination Act states “The review team shall include upper-level management officials and seek input from line supervisors, investigators and qualified health care and or mental health professionals, as appropriate.” d) DCSO policy 803 Prison Rape Elimination Act requires the review to consider the five factors of the provision. The review and recommendations by the review team are to be documented in a report that is reviewed and approved by the Jail Director. e) DCSO policy 803 Prison Rape Elimination Act states “The Jail Director or the authorized designee shall implement the recommendations for improvement or document the reasons for not doing so.” Facility Head Interview – The Jail Director said the review team consists of upper-level management team. He said the team reviews the investigation report; staffing; characteristics of the victim; physical and video evidence. If the team recommends additional cameras, policy changes or other corrections, he reviews and approves or denies the recommended correction. If he cannot approve, he provides an explanation on the form. The facility did not have a completed investigation of sexual abuse that required a review during the last 12 months. DCSO policy requires a sexual abuse incident review at the conclusion of each sexual abuse investigation unless the allegation is determined to be unfounded, with the review completed within 30 days. The review team is required to include upper-level management and seek input from line supervisors, investigators, and medical or mental health professionals as appropriate. The review must consider the required factors, document findings and recommendations in a report reviewed by the Jail Director, and either implement recommended improvements or document the reasons for not doing so. The Jail Director described a process consistent with policy,

	and the facility reported that there were no completed sexual abuse investigations during the review period that required an incident review. Based on the information from interviews and policies reviewed, it has been determined that the facility meets the standard.
--	--

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “The PREA Coordinator shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.” b) DCSO policy 803 Prison Rape Elimination Act states “The PREA Coordinator shall aggregate the incident-based sexual abuse data at least annually.” c) DCSO policy 803 Prison Rape Elimination Act states “The data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the U.S. DOJ.” d) DCSO policy 803 Prison Rape Elimination Act states “The data shall be maintained, reviewed and collected from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews and any incident-based and aggregated data.” f) DCSO policy 803 Prison Rape Elimination Act states “Upon request, the PREA Coordinator shall provide all such data from the previous calendar year to the U.S. Department of Justice (DOJ) no later than June 30.” Document Review - The facility provided a copy of the Summary Report for the 2023 and 2024 Survey of Sexual Victimization along with two substantiated incident forms for each year. PREA Coordinator Interview - The PREA Coordinator said he tracks the data needed for the DOJ report by using the DOJ incident form to gather the information for each incident. He said the DOJ asked for the DCJ to complete a Survey of Sexual Victimization report for 2023 and 2024. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard

Auditor Discussion

a-b) DCSO policy 803 Prison Rape Elimination Act states “This office shall conduct an annual review of collected and aggregated incident-based sexual abuse data. The purpose of these reviews is to assess and improve the effectiveness of sexual abuse prevention, detection and response policies, practices and training by: Identifying problem areas; Identifying corrective actions taken; Recommending corrective actions; Comparing current annual data and corrective actions with those from prior years; Assessing the office's progress in addressing sexual abuse.”

Agency Head Interview – The Sheriff said the PREA Coordinator collects data on PREA incidents for the Jail. He creates an annual report that summarizes the data and corrective actions from reviews. The Jail Director signs it and sends it to him for review and signature. It is posted on the website.

PREA Coordinator Interview – The PREA Coordinator said they use the incident reviews to collect data for the annual report. The information is summarized in an annual report. The reports are reviewed by the Jail Director and sent to the Sheriff for final approval.

The facility provided the 2023, 2024 and 2025 annual PREA reports through the online audit system. The reports provide the definitions of sexual abuse and sexual harassment, a summary of the types of allegations and investigation outcomes, a comparison of the current year’s data to the previous years, and actions taken to improve the prevention and response to sexual abuse.

c) DCSO policy 803 Prison Rape Elimination Act states “The reports shall be approved by the Jail Director and made available through the office website.”

The 2025 Sexual Abuse Prevention Program Annual Report is posted on the DCSO website at <https://sheriff.co.delaware.oh.us/prea/>.

d) DCSO policy 803 Prison Rape Elimination Act states “Material may be redacted from the reports when publication would present a clear and specific threat to the safety and security of the facility. However, the nature of the redacted material shall be indicated.”

The substantiated incident report forms for the 2023 and 2024 SSV did not include personal information that would reveal the identity of people involved in the incidents.

Delaware County Jail’s Policy 803 establishes a zero-tolerance approach to sexual abuse and sexual harassment and includes procedures for prevention, detection, response, definitions of prohibited conduct, and related sanctions. Interviews confirmed that staff understand their duty to report any knowledge or suspicion of sexual abuse, sexual harassment, retaliation, or failure to report, and inmates reported receiving information about the zero-tolerance policy on their first day at the facility. The section also confirms that the Assistant Jail Director serves as the PREA

	Coordinator, has sufficient authority and time to oversee compliance, communicates regularly with jail leadership, and can address compliance issues with support from the Jail Director. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.
--	--

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) DCSO policy 803 Prison Rape Elimination Act states “All case records and reports associated with a claim of sexual abuse and sexual harassment, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment or counseling shall be securely retained in accordance with confidentiality laws.” PREA Coordinator Interview – All data for PREA incidents is stored in a locked cabinet in the PREA Coordinator’s office and on the Jail Management System. Staff access is controlled and limited staff have access to the PREA data. Tour Observation – During the tour, the PREA Coordinator showed this auditor the locked cabinet in his office where the PREA files are located. The investigation files are locked in the Facility Investigator’s office in a cabinet. The offices are located in a secured area that has controlled access. b) DCSO policy 803 Prison Rape Elimination Act states “All aggregated sexual abuse data from Delaware County Sheriff's Office facilities and private facilities with which it contracts shall be made available to the public at least annually through the office website. Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed.” The 2025 Sexual Abuse Prevention Program Annual Report is posted on the DCSO website at https://sheriff.co.delaware.oh.us/prea/. c) DCSO policy 803 Prison Rape Elimination Act states “Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed.” The annual PREA Reports do not include personal identifying information. The substantiated incident report forms for the 2023 and 2024 SSV did not include personal information that would reveal the identity of people involved in the incidents. d) DCSO policy 803 Prison Rape Elimination Act states “All other data collected pursuant to this policy shall be securely maintained for at least 10 years after the

	date of the initial collection, unless federal, state or local law requires otherwise.” Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.
--	--

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) The DCSO Jail completed a PREA audit in 2023. It is the only facility in the agency. b) The DCSO is an agency with one facility, the DCSO Jail. h) The tour of the DCSO Jail covered all areas of the facility. i) The DCSO Jail staff provided all documents requested and documents required for completing the pre-audit questionnaire. m) A private room was provided to the auditor for all inmate interviews. n) The Notice of Audit was appropriately posted throughout the facility six weeks prior to the onsite audit. No correspondence was received.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The 2023 PREA audit report for DCSO Jail was found on the DCSSO website at https://sheriff.co.delaware.oh.us/wp-content/uploads/sites/6/2023/07/Final-Report-Delaware-County-Jail-2023-PREA-Certified.pdf. The report was posted for the public on the website as required.

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.)	yes
---	-----

115.12 (b) Contracting with other entities for the confinement of inmates

Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	yes
---	-----

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
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.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	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	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.15 (f)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes

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

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

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
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	yes

	contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
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.)	na
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	yes

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

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

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

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

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

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

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

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

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

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

	being sexually abusive, to inform: Education Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
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	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
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	yes

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
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	yes

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

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

	does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
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?	yes

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

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

	confidentiality, at the initiation of services?	
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	yes

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

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

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

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

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

	committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who	yes

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

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

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

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

	115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	
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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
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,	yes

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

	where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	
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	na

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