

# PREA Facility Audit Report: Final

**Name of Facility:** Solano County Justice Center Detention Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** 10/03/2022

**Date Final Report Submitted:** 03/27/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Eric Woodford	<b>Date of Signature:</b> 03/27/2023

AUDITOR INFORMATION	
<b>Auditor name:</b>	Woodford, Eric
<b>Email:</b>	eiw@comcast.net
<b>Start Date of On-Site Audit:</b>	08/29/2022
<b>End Date of On-Site Audit:</b>	09/02/2022

FACILITY INFORMATION	
<b>Facility name:</b>	Solano County Justice Center Detention Facility
<b>Facility physical address:</b>	500 Union Avenue, Fairfield, California - 94533
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Lt. Craig Collins
<b>Email Address:</b>	CACollins@SolanoCounty.com
<b>Telephone Number:</b>	707-784-7438

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Tom Ferrara
<b>Email Address:</b>	Tferrara@solanocounty.com
<b>Telephone Number:</b>	707-784-7030

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Steven Clemente
<b>Email Address:</b>	seclemente@solanocounty.com
<b>Telephone Number:</b>	O: (707) 784-7515

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Sgt. Jeff Poblete
<b>Email Address:</b>	JLPoblete@solanocounty.com
<b>Telephone Number:</b>	707-784-1389

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	678
<b>Current population of facility:</b>	193
<b>Average daily population for the past 12 months:</b>	206
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18 to 65 plus
<b>Facility security levels/inmate custody levels:</b>	Min, Med, Max, ADSEP, PC & IW
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	543
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	263
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	15

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Solano County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	530 Union Avenue Suite 100, Fairfield, California - 94533
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

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

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Craig Collins	<b>Email Address:</b>	cacollins@solanocounty.com

<b>SUMMARY OF AUDIT FINDINGS</b>	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
<b>Number of standards exceeded:</b>	
1	<ul style="list-style-type: none"> <li>• 115.64 - Staff first responder duties</li> </ul>
<b>Number of standards met:</b>	
44	
<b>Number of standards not met:</b>	
0	

## POST-AUDIT REPORTING INFORMATION

# GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-08-29
2. End date of the onsite portion of the audit:	2022-09-02

### Outreach

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

# AUDITED FACILITY INFORMATION

14. Designated facility capacity:	678
15. Average daily population for the past 12 months:	206
16. Number of inmate/resident/detainee housing units:	28
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	204
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	2
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	2
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	7

<p><b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>29</p>
<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>10</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>None to report.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>75</p>

<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>20</p>
<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>22</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>Nothing to report</p>

## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>11</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Age</li> <li><input checked="" type="checkbox"/> Race</li> <li><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</li> <li><input checked="" type="checkbox"/> Length of time in the facility</li> <li><input checked="" type="checkbox"/> Housing assignment</li> <li><input checked="" type="checkbox"/> Gender</li> <li><input type="checkbox"/> Other</li> <li><input type="checkbox"/> None</li> </ul>

<b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	Based on roster characteristics provided by the facility
<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	Nothing to report
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	12
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2

<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Staff indicated Blind inmates are transferred from intake to one of the other facilities. Intake and PREA Coordinator indicate there are no blind or low vision inmates currently housed in JCDF during the onsite audit.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>

<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input checked="" type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>1</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input checked="" type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>2</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>One Inmate placed in Segregation/isolation for risk of victimization had been sexually abused in the past and was currently pregnant. The second inmate placed in Segregated housing for Risk of Victimization was non-English speaking (east Indian) and elderly.</p> <p>3 Random inmates were randomly selected to make up minimum targeted inmate quota.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>If "Other," describe:</b></p>	<p>Gender and race was a selection factor.</p>

<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>Female staff was over sampled as there were a minimum number of female staff for each shift.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>34</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>78. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>79. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input type="checkbox"/> Intake staff  <input type="checkbox"/> Other
<b>If "Other," provide additional specialized staff roles interviewed:</b>	<ol style="list-style-type: none"> <li>1. Inmate mail staff</li> <li>2. Training staff</li> <li>3. Grievance Response staff</li> <li>4. Volunteer/Contractor Coordinators</li> </ol>
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes  <input checked="" type="radio"/> No
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	4
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention  <input checked="" type="checkbox"/> Education/programming  <input checked="" type="checkbox"/> Medical/dental  <input checked="" type="checkbox"/> Food service  <input type="checkbox"/> Maintenance/construction  <input checked="" type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No Volunteers assigned to JCDF

# SITE REVIEW AND DOCUMENTATION SAMPLING

## Site Review

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

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

<p><b>88. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No additional information to provide.</p>

## 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.

<p><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>Agency provided the appropriate documents as requested for sampling on both staff and inmates to include the requested characteristics for random selections of documentation</p>

# SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

## Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	2	0	2	0
<b>Staff-on-inmate sexual abuse</b>	3	0	3	0
<b>Total</b>	5	x	5	x

**You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.**

- None of the 5 Sexual Abuse allegations over the past 12 months were referred to the DA office. All 5 investigations were conducted by assigned Agency investigators, investigated administratively and determined to be unfounded.
- None of the 5 Sexual Abuse allegations over the past 12 months were investigated both criminally and administratively.

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	3	0	3	0
<b>Staff-on-inmate sexual harassment</b>	1	0	1	0
<b>Total</b>	4	x	4	x

**You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.**

- None of the 4 sexual harassment allegations over the past 12 months were investigated criminally
- None of the 4 sexual harassment allegations over the past 12 months were investigated both criminally and administratively

## **Sexual Abuse and Sexual Harassment Investigation Outcomes**

### **Sexual Abuse Investigation Outcomes**

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

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

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

**You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.**

None of the 5 Sexual Abuse allegations investigations conducted over the past 12 months are Ongoing, Referred for prosecution, Indicted/court case filed, Convicted/ adjudicated or Acquitted.

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	2	0	0
<b>Staff-on-inmate sexual abuse</b>	0	3	0	0
<b>Total</b>	x	5	x	x

**You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.**

None of the 5 Sexual Abuse Allegations are Ongoing or found to be unsubstantiated or substantiated.

**Sexual Harassment Investigation Outcomes**

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

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

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

**You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.**

None of the 4 Sexual Harassment allegations investigated over the past 12 months are Ongoing, Referred for prosecution, Indicted/ Court case filed, Convicted/Adjudicated or Acquitted.

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	2	1	0
<b>Staff-on-inmate sexual harassment</b>	0	1	0	0
<b>Total</b>	x	3	1	x

<p><b>You indicated that you are unable to provide information for one or more of the fields above. Explain why this information could not be provided.</b></p>	<ul style="list-style-type: none"> <li>• None of the 4 Sexual Harassment allegations investigations are ongoing.</li> <li>• 3 of the 4 Sexual Harassment Allegation investigations were determined to be unfounded</li> <li>• 1 of the 4 Sexual Harassment Allegations was determined to be Unsubstantiated</li> <li>• None of the 4 Sexual Harassment Allegations were determined to be Substantiated</li> </ul>
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## Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

### Sexual Abuse Investigation Files Selected for Review

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

### Inmate-on-inmate sexual abuse investigation files

<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p style="text-align: center;">2</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p> <input type="radio"/> Yes  <input checked="" type="radio"/> No  <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>

<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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**Staff-on-inmate sexual abuse investigation files**

<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>3</p>
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<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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**Sexual Harassment Investigation Files Selected for Review**

<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>4</p>
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<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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## Inmate-on-inmate sexual harassment investigation files

<b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	3
<b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
<b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

## Staff-on-inmate sexual harassment investigation files

<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	1
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No  <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
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<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	No Sexual Abuse of Sexual Harassment allegations criminally investigated over the past 12 months. All investigations conducted administratively.
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## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
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### Non-certified Support Staff

<b>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
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# AUDITING ARRANGEMENTS AND COMPENSATION

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

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

## Standards

### Auditor Overall Determination Definitions

- 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.

<b>115.11</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.11(a): Policy 606 PREA mandates that This policy provides guidance for complying with the Prison Rape Elimination Act of 2003 (PREA) and the implementing regulation that establishes standards (PREA Rule) to prevent, detect, and respond to sexual abuse, harassment, and retaliation against inmates in the Solano County Sheriffs Office Detention Facilities (28 CFR 115.11; 15 CCR 1029). Definitions of prohibited behaviors regarding sexual abuse and sexual harassment are outlined in the policy. This office has zero tolerance with regard to sexual abuse and sexual harassment in this facility. This office will take appropriate affirmative measures to protect all inmates from sexual abuse and harassment, and promptly and thoroughly investigate all allegations of sexual abuse and sexual harassment. sanctions for those found to have participated in prohibited behaviors is included in the Policy on pg 9.</p> <p>Description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates is also outlined in the Policy through appropriate affirmative measures to protect all inmates from sexual abuse and harassment, and promptly and thoroughly investigate all allegations of sexual abuse and sexual harassment. .</p> <p>115.11(b): According to the Solano Sheriff's Organizational Chart provided by Agency, the PREA Coordinator's position is identified in an upper-level, agency-wide position under the Custody Captain, 4th in line from the Sheriff.</p> <p>Interview with the PREA Coordinator indicates he has enough time to manage all of his PREA related responsibilities, the. There are three PREA Compliance Managers throughout the agency, one designated for each facility. Bi-monthly meetings as a group are conducted to discuss PREA issues. Should an issue be identified regarding compliance with the PREA Standards, group discussions on resolution and implementations occur. These decisions affect safety and security in the institution to ensure no conflict occurs with the Board of State and Community Corrections (BSCC).</p> <p>115.11(c): The Sheriff's Organizational Chart designates a PREA Compliance Manager for all 3 Solano County Detention Facilities, each in the position of a Custody Lieutenant who reports to the PREA Coordinator.</p> <p>Interview with the PREA Compliance Manager indicates that he has enough time to manage all of his PREA related responsibilities.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.11.</p>

115.12	Contracting with other entities for the confinement of inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.12(a): N/A - Agency states that the agency has not entered into or renewed a contract for the confinement of inmates since the last PREA audit.</p> <p>115.12(b): N/A - Agency states that they do not contract with private agencies or other entities for the confinement of inmates. Interview with Agency's Contract Administrator indicates that there are no contracts for the confinement of inmates.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.12.</p>

<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.13(a): Policy 606 PREA mandates that Agency develop a staffing plan to provide adequate levels of staffing and video monitoring, where applicable, in order to protect detainees from sexual abuse. This includes documenting deviations and the reasons for deviations from the staffing plan, as well as reviewing the staffing plan a minimum of once per year. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration (28 CFR 115.13).</p> <p>Agency has posted the PREA Staffing Plan Justice Center dated 1/3/22. The last PREA audit of JCDF was in 2019. The average population was calculated from 6/5/19 to 6/5/22. Since the last PREA audit the average daily number of inmates of which the staffing plan was predicated was 689.</p> <p>During the onsite PREA audit, auditor observed the staffing levels of security and non-security staff, staffing patterns on each shift both within and outside of housing units. Facility has minimal programming, work or education so there is little inmate movement outside of the housing units. Facility possesses multiple cameras and mirrors throughout the facility. Custody staff wears body worn cameras during each shift. Identified blind spots are covered by video cameras and monitored in multiple control rooms staffed by at least two custody staff members. Control constantly observes camera feeds and operates doors throughout the facility to maintain safety for both staff and inmates and controls movement throughout the facility. Staff are observed conducting frequent cell checks in the housing units.</p> <p>Interview with the Facility Commander indicates that facility possesses a staffing plan which provides adequate staffing levels to protect and makes again sexual abuse considered in the plan. Staffing plan also includes video monitoring and is documented. Staffing plan considers all items identified in Standard 115.13(a) items 1 through 11. This was corroborated through Staffing Plan review by the auditor. The commander indicates he checks for compliance with the staffing plan by sharing assigned staff are on duty and coordinates of shifts with the PREA Coordinator.</p> <p>PREA Compliance Manager indicates that when assessing adequate staffing levels in the need for video monitoring the generally accepted detention and correctional practices, any findings of inadequacy, the physical plant regarding blindspots, composition of the inmate population, number and placement of supervisory staff to include instructional programs occurring on all shifts, applicable state or local laws, regulations or standards, prevalence of substantiated unsubstantiated incidence of sexual abuse are all player role when reviewing the staffing plan. The Board of State and Community Corrections is changing and adjusting to the PREA Standards in order to increase inmate out of cell opportunities, therefore, safety and security is an issue to consider.</p> <p>115.13(b): Agency has provided detailed memorandums titled Notice of Staffing Deviations which spans the months of January, February, March, April and May of 2022. Agency indicates that the most common reasons from deviating from the Staffing Plan in the past 12 months has been COVID positive staff. Officers out on</p>

extended leave, vacant positions, either at the Correctional Officer Academy or in the Jail Training Program and Hiring Difficulties.

Interview with Facility Commander indicates that the facility documents all instances of noncompliance with the staffing plan. Documentation is maintained through the SharePoint database. Any deficiencies are written in a memorandum to the Division Commander to explain any staffing plan deficiencies.

115.13(c): PREA Policy 606 PREA mandates that at least once every year the facility/ agency, in collaboration with the PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to: (a) the staffing plan, (b) the deployment of monitoring technology, or (c) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan. Agency provided auditor with copy of the January 3, 2022 Staffing Plan. Review of the Staffing Plan indicates discussion and narratives which meets all 11 criteria outlined in Standard 115.33(a). Interview with the PREA Coordinator indicates that he is consulted regarding any assessments of, or adjustments to, staffing plan for this facility. He is consulted at least annually for the updated staffing plans. Agency has not provided either annual Staffing Plans or annual Staffing Plan reviews conducted prior to 2022 to verify Staffing Plan reviews being conducted annually.

115.13(d): Policy 606 PREA mandates that Agency implements a protocol requiring mid-level or higher-level supervisors to conduct and document unannounced inspections to identify and deter sexual abuse and sexual harassment. The protocol shall prohibit announcing when such inspections are to occur, unless it is necessary for operational considerations (28 CFR 115.13). Agency has provided auditor with the Sharepoint spreadsheet roster of unannounced rounds conducted by various Supervisors within each Solano County Sheriff's Detention Facility on each shift during the months between April 2017 and March 2022. The roster identifies whether the Supervisor spoke with staff, spoke with inmates, which shift was contacted and the area the Supervisor visited to include notes which identifies the discussions conducted with staff or inmates.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.13(c) and corrective action is required.

**Corrective Action Recommended:**

115.13(c): Agency is required to provide auditor with Staffing Plan or Staffing Plan Review memorandum conducted between 2019 & 2022 for Standard provision compliance verification.

1. Please provide Standard provision and upload Staffing Plan Review memorandums or Staffing Plans conducted between 2019 & 2022 to OAS Supplemental File for verification of compliance with Standard provision 115.13(a)

**Corrective Action Completion 12/21/22:**

115.13(c): Agency provided auditor with copies of the 2020, 2021 and 2022 Justice Center detention Facility (JCDF) Staffing Plans. The documents outlined and discussed Facility Overview, Inmate Population & Composition, Programs, Medical & Dental services, Court Holding, Training, PREA Case Statistics, Staffing on all shifts, Number of Supervisory Staff, Shift Assignments, Support Positions, Staffing Plan Development, Findings of inadequacy and Physical plant component. Original Staffing Plan and annual Staffing Plan Reviews complies with Standard provision 115.13(a).

The agency/facility has met the requirements of Standard provision(s) 115.13(c) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115,13.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.14(a): N/A - Agency reports they do not house youthful inmates under 18 years of age per California Welfare &amp; Institution Code 207. Informal conversations with staff during the Physical Plant Review and auditor's observation during the week-long PREA audit verifies this claim.</p> <p>115.14(b): N/A - Agency reports they do not house youthful inmates under 18 years of age per California Welfare &amp; Institution Code 207. Informal conversations with staff during the Physical Plant Review and auditor's observation during the week-long PREA audit verifies this claim.</p> <p>115.14(c): N/A - Agency reports they do not house youthful inmates under 18 years of age per California Welfare &amp; Institution Code 207. Informal conversations with staff during the Physical Plant Review and auditor's observation during the week-long PREA audit verifies this claim.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.14.</p>

<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.15(a): Policy 518 PREA mandates that unless conducted by a qualified health care professional a strip search shall be conducted by staff members of the same sex as the person being searched (Penal Code § 4030). Cross-gender strip searches are prohibited. (c) Only a physician may conduct a physical body cavity search. Except in exigent circumstances, only a physician who is not responsible for providing ongoing care to the inmate may conduct the search (15 CCR 1206(0)).</p> <p>(d) Except for the physician conducting the search, persons present should be of the same sex as the person being searched. Only the necessary staff needed to maintain the safety and security of the medical personnel shall be present (Penal Code § 4030).</p> <p>(e) Privacy requirements, including restricted touching of body parts and sanitary condition requirements are the same as required for a strip search.</p> <p>(f) All such searches shall be documented.</p> <p>In the past 12 months, the Agency has stated that no cross-gender strip or cross-gender visual body cavity searches of inmates have been conducted. In the past 12 months, no cross-gender strip or cross-gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff. Interview with non-medical staff (involved in cross-gender strip or visual searches) indicates that the only urgent circumstance that may require cross-gender strip searches and visual body cavity searches is a riot situation, however, that should not be an issue as we have 3 facilities and multiple number of staff members in each facility. Should there be cross-gender strip or visual body cavity searches occur, incident is documented in Advanced Technology Information Management System (ATIMS).</p> <p>115.15(b): Policy 518 PREA mandates that except in exigent circumstances, male staff may not pat down female inmates and female staff may not pat down male inmates. Absent the availability of a same sex staff member, it is recommended that a witnessing staff member be present during any pat-down search of an individual of the opposite sex. All cross-gender pat-down searches shall be documented in the Jail Management System (JMS) outlining the exigency. Documentation shall be forwarded to the Facility Commander and the PREA Coordinator. Under no circumstances shall male custody staff perform non-emergency clothed body searches of female inmates (28 CFR 115.15). Female inmates have access to multiple programs per Legacy Policy. Custody Division Procedures 19.002 mandates that "The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. It is the policy of the Solano County Sheriff's Office Custody Division to offer evidence-based educational, vocational, substance abuse and other services designed to reduce recidivism to inmates in its custody. No inmate shall be required or coerced to participate in programs, nor penalized for refusing to participate. Inmates may refuse to participate in a rehabilitation or treatment program, except as required by statute or ordered by the sentencing court or paroling authority.</p>

No inmates, program beneficiaries, or participants shall be denied participation in programs or work assignments based on race, religion, national origin, sex, disability, or political beliefs. The Solano County jail facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities."

Agency reports that one (1) pat-down search of female inmate, who identified as male, was conducted by male staff over the past 12 months and this pat-down search did not involve exigent circumstances. Agency provided auditor with copy of the Cross-gender Pat Search Report. The incident occurred on 2/25/22 in the JCDF Receiving Pat Search Area on an inmate believed to be male and identified as male.

The inmate was cleared as male by medical staff in Booking. Subject's relative contacted the jail to inform staff that the inmate in question identifies as male but was born female and was in fact Transgender. The inmate had been in a holding cell with a male inmate for 38 minutes, continuously visible on the Booking Male Holding B camera. Review of footage showed no incidents occurring during that window of time. The inmate was removed from the holding cell and after a private conversation, self identified as trans male with a birth sex of female. The inmate was moved to the pre-book cell and subsequently released from custody on bail.

Interview with random sample of 12 staff indicate that if female staff are not available to conduct a search of a female inmates at the Justice Center, the jail will obtain female staff from one of the other facilities to assist. Female staff are assigned to each shift in each facility.

Interview with 5 randomly selected female incarcerated persons indicate that they have not been unable to participate in activities outside of the cell because female staff is unavailable to conduct pad down searches.

115.15(c): Facility policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented. Per Policy 3.013 Documenting Strip searches of opposite gender Legacy P&P mandates that "Custody staff shall not conduct pat, strip or visual body searches of inmates of the opposite gender unless there are well-documented emergency or exigent circumstances."

Policy 518 PREA mandates that "Under no circumstances shall male custody staff perform non-emergency clothed body searches of female inmates (28 CFR 115.15). "

115.15(d): Policy 3.013 Documenting Strip searches of opposite gender Legacy P&P mandates that:

2. The presence of opposite gender staff or visitors in all housing units shall be announced to the inmates, prior to staff entry. The announcement will provide appropriate warning to inmates who may be changing clothing or using the toilet. These announcements shall consist of "male on the floor" in a female housing module or unit and "female on the floor" in a male housing module or unit.
3. The presence of opposite gender staff or visitors in areas where inmates may be strip searched and/or dressed in and/or out, such as the safety cell, intake area or inmate release area, shall be announced to the inmates, prior to staff entry.
4. Custody staff shall not enter the shower and toilet areas, living spaces or cells of opposite gender inmates, except in exigent or emergency circumstance, and/or when

accompanied by a staff member who is the same gender as the inmate.

5. Custody staff may perform observation log checks on inmates of the opposite gender; however, the previously mentioned announcement must be made.

Custody Policy & Procedure Policy 3.013 mandates that The presence of opposite sex gender staff or visitors in all housing units shall be announced to the inmates, prior to staff entry. The announcement will provide appropriate warning to inmates who may be changing clothing or using the toilet. These announcements shall consist of "male on the floor" in a female housing module or unit and "female on the floor" in a male housing module or unit.

Agency places "Announce Yourself" imogi outside the doors of all housing units to remind all cross-gender staff, contractors and visitors to announced themselves before entering a cross-gender housing unit.

Interview with 11 randomly selected incarcerated persons indicate that male staff announce their presence when entering the housing units and they are not naked in full view of male/female staff.

12 Random Sample of Staff indicates that inmates are always able to dress, shower and toilet without being viewed by staff of the opposite gender. Auditor observed when entering housing units of opposite gender, custody staff announced "Female on Floor" or "Male on Floor" when entering the housing unit.

Auditor observed the housing units all possessed an "ANNOUNCE" imogi pasted to the outside door of each housing unit to remind cross-gender staff to announce before entering the housing units.

During the onsite audit, Auditor observed the control room where camera feeds are reviewed by all staff assigned. There was not cross-gender viewing available from any of the video monitors. Those that may have a cross-gender view was pixelated in the area that would allow cross-gender viewing during toileting. No camera or mirror views of showers observed. Agency has made efforts to ensure incarcerated persons housed in their facility have privacy, however, auditor observed the windows in the cell doors of all housing units allowed for cross-gender viewing of incarcerated persons between the first and second bolt of the window during toileting in virtually each housing unit. In addition, when walking up the stairs to the multi-purpose room and visiting access in each housing unit, cross-gender viewing of incarcerated persons are viewable taking showers. During interviews 5 incarcerated persons admitted they were viewed by staff in moments of undress during toileting and showering that did not involve count.

115.15(e): Policy 518 PREA mandates that staff shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining genital status (see Prison Rape Elimination Act Policy for transgender and intersex definitions). If genital status is unknown, it may be determined during conversations with the inmate or by reviewing arrest history, available databases, available medical records or, if necessary, by obtaining that information as part of a broader medical examination conducted in private by a qualified health care professional (28 CFR 115.15). Agency reports that such searches have not occurred in the past 12 months. Interview with 12 Random Sample of Staff indicates that all staff are aware of the policy prohibiting them from searching or physical examining a transgender or intersex inmate for the sole purpose of determining the genital status. They asked the inmates

preference regards to pat searches and alert the sergeant of the preference. Interview with 1 Transgender Inmate indicates that during their experience while incarcerated, he was asked his preference as to whom he wanted to conduct the pat search. Staff complied with his preference.

115.15(f): Agency reports that 100% of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs. All custody staff are trained on cross-gender searches and searches of transgender and intersex inmates. Agency provided auditor with the 4 hour refresher training on cross-gender and transgender pat searches PREA Custody 2022. Auditor was provided the electronic Activity Detail and Student rosters which includes Activity Notes on the rosters which states: "By signing this, the student affirms they understand the content provided in this PREA training." , which identified all staff assigned to Justice Center Detention Facility (JCDF), highlighting the names of assigned staff who attended the electronic training from March 2, 2022 to March 17, 2022. Auditor was also provided the National PREA Resource Center Guidance in Cross-Gender and Transgender Pat Searches Facilitator Guide & PPT, PREA Pat Search Training final and 4 hour Refresher PREA Custody 2022 new Interview with 12 Random Sample of Staff indicates that they have all recieved training on how to conduct cross-gender pat-down searches in either 2021 or 2022.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.15(d) and corrective action is required.

**Corrective Action Recommended:**

115.15(d): Agency has made efforts to ensure incarcerated persons housed in their facility have privacy, however, auditor observed the windows in the cell doors of all housing units allowed for cross-gender viewing of incarcerated persons between the first and second bolt of the window during toileting in virtually each housing unit. In addition, when walking up the stairs to the multi-purpose room and visiting access in each housing unit, cross-gender viewing of incarcerated persons are viewable taking showers. During interviews 5 inmates of both genders admitted they were viewed by staff in moments of undress during toileting and showering that did not involve count.

1. Agency to take measures to dissuade cross-gender viewing during toileting through the cell door windows of each housing unit.
2. Agency to take measures to dissuade cross-gender viewing during showering from the housing unit stairway when inmates or staff use stairs to access multi-purpose room or visiting.

**Corrective Action Completion 2/22/23:**

115.15(d): Site visit conducted on 2/17/23 to verify Corrective Action compliance for Standard provision 115.51(a). Auditor conducted a walk-through of the facility and

visually verified the following corrections conducted by the facility:  
Cell windows and showers were viewed by auditor in each occupied and unoccupied housing unit and court holding areas. Level 2, housing modules ABCD & EF (both unoccupied units due to ongoing construction) - GHI & JKL (both occupied units) - M&N (medical) had all cell windows were treated with chemical etching to dissuade cross-gender viewing during toileting. Showers along the stairwell to the multi-purpose room and visiting modules was also treated with chemical etching in two sections to dissuade cross-gender viewing during showering. In Level 2 M-housing unit, auditor found cell M-05 chemical etching as non-compliant due to the cell toilet being in the back of the cell instead of near the entry door as the other cells. Cross-gender viewing during toileting is evident. Etching needs to be expanded to the 2nd or 3rd bolt to dissuade cross-gender viewing. Agency provided photo verification of the above identified compliance updates.

On 2/22/23, PREA Coordinator provided auditor with photos of before and after etching addition to indicate the compliant update where the etching was expanded to the agreed 3rd and 4th window bolt in order to provide inmate privacy during toileting in the cell. This cell is now compliant with the PREA Standard as it dissuades cross-gender viewing during toileting.

Level 4, housing modules ABC & DEF (unoccupied units due to construction) - GHI & JKL (both occupied) had all cell windows were treated with chemical etching to dissuade cross-gender viewing during toileting. Showers along the stairwell to the multi-purpose room and visiting modules was also treated with chemical etching in two sections to dissuade cross-gender viewing during showering.

Court Holding in Basement had holding cells for inmates awaiting court. Auditor found all cells were PREA compliant except for cell A-8 as the window etching needs to be expanded between window fastening bolts 2 to 3.5. 2/22/23, PREA Coordinator provided auditor with photos of before and after etching addition to indicate the compliant update where etching was expanded between window fastening bolts 2.5 & 4 in order to eliminate cross-gender viewing during toileting in cell A-8.

The agency/facility has met the requirements of Standard provision(s) 115.15(d) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.15.

<p><b>115.16</b></p>	<p><b>Inmates with disabilities and inmates who are limited English proficient</b></p>
<p><b>Auditor Overall Determination:</b> Meets Standard</p>	
<p><b>Auditor Discussion</b></p>	
<p>115.16(a): The agency has established procedures to provide disabled inmates 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 by providing inmate who are disabled and Limited English Proficient with Point Book and Language line. Agency provided auditor with written contract with Language Line initiated on 8/7/18 and expires on 8/7/2023 for interpreter services usage. Agency describes Accommodating inmates with Special Needs as:</p> <p>The facility shall ensure that inmates who are limited English proficient, deaf or disabled are able to report sexual abuse and sexual harassment to staff directly or through other established reporting mechanisms, such as abuse hotlines, without relying on inmate interpreters, absent exigent circumstances. Agency assists with providing inmates with contact with outside organizations contracted to receive reports of sexual misconduct within the facility such as:</p> <p>SafeQuest Solano at 707-422-7345 or 1-866-4-UR-SAFE (487-7233).</p> <p>Inmates can also call SafeQuest toll-free by dialing *93 from any inmate phone.</p> <p>Interview with Agency Head designee indicates that agency establishes procedures to provide inmates with disabilities and inmates who are limited English proficient equal opportunity to participate in all aspects of the agencies efforts to project, detect, and respond to multiple of the sexual abuse and sexual harassment through multiple measures which includes language line, point books and TDD in both medical and intake.</p> <p>Interview with Inmates (with disabilities or who are limited English proficient) indicates that the staff interpreter provides information about sexual use the sexual-harassment that he was able to understand, he indicated that staff was reading the information to him in intake. Since he has been housed in the facility he's been provided his rights related to sexual abuse via staff interpreters and staff is available to interpret for him whenever he needs it.</p> <p>During interviews, auditor utilized staff interpreters for LEP inmates who needed a Spanish translator, and another inmate who was Deaf and required a staff member who could interpret for him using American Sign Language. This same staff member assisted the inmate with translation services when he was booked into the facility.</p> <p>115.16(b): The agency has established procedures to provide disabled inmates 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 by providing inmate who are disabled and Limited English Proficient with Point Book and Language line. Agency provided auditor with written contract with Language Line initiated on 8/7/18 and expires on 8/7/2023 for interpreter services usage.</p> <p>Interview with Inmates (with disabilities or who are limited English proficient) indicates that the staff interpreter provides information about sexual use the sexual-harassment that he was able to understand, he indicated that staff was reading the</p>	

information to him in intake. Since he has been housed in the facility he's been provided his rights related to sexual abuse via staff interpreters and staff is available to interpret for him whenever he needs it.

115.16(c): Policy 606 PREA mandates that Should an investigation involve inmates who have disabilities or who have limited English proficiency, the first responder shall not rely on inmate interpreters, inmate readers or other types of inmate assistants, except in limited circumstances where an extended delay in obtaining an interpreter could compromise inmate safety, the performance of first responder duties or the investigation of sexual abuse or sexual harassment allegations (28 CFR 115.16).

Agency reports that in the past 12 months, there has been no instances where inmate interpreters, readers, or other types of inmate assistants have been used and there was no case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations.

Interview with random sample of 12 staff indicates that the agency does not allow use of inmate interpreters when a victim is making an allegation of sexual abuse of sexual harassment. Staff interpreters are utilized or medical can provide contract interpreters through Language Line.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.16.

<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1337 416">115.17(a): Policy 300 Custody Policy Manual mandates that no members or contractors shall be hired who have (28 CFR 115.17):</p> <ul style="list-style-type: none"> <li data-bbox="256 423 1461 499">(a) Engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 USC § 1997).</li> <li data-bbox="256 506 1469 627">(b) Been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, by overt or implied threats of force, or by coercion, or if the victim did not consent, or was unable to consent or refuse.</li> <li data-bbox="256 633 1481 875">(c) Been civilly or administratively adjudicated to have engaged in the activity described in paragraph {b) of this section. Agency failed to provide promotional documentation on 2 staff who have been promoted in the past 12 months. Agency also failed to provide hire date, criminal background date, criminal background source and 3 required question documentation for 16 custody staff members in order to verify compliance with Standard provision 115.17(a).</li> </ul> <p data-bbox="256 913 1433 1115">115.17(b): Policy 300 Custody Policy Manual mandates that employees must have the ability to resolve problems in a way that shows sensitivity for the feelings of others. Factors related to this ability include empathy, discretion, effectiveness in dealing with people without arousing antagonism and the ability to understand the motives of people and how they will react and interact.</p> <p data-bbox="256 1122 668 1158">Disqualifying factors include:</p> <ul style="list-style-type: none"> <li data-bbox="256 1164 1426 1285">(a) Having been disciplined by any employer (including the military and/or any correctional officer or law enforcement training facility) for acts constituting racial, ethnic or sexual harassment or discrimination.</li> <li data-bbox="256 1292 1361 1368">(b) Uttering any epithet derogatory of another person's race, religion, gender, national origin or sexual orientation.</li> <li data-bbox="256 1375 1477 1534">(c) Having been disciplined by any employer as an adult for fighting in the workplace. Interview with Human Resources staff indicates that the facility considers both a prior incidents of sexual harassment when determining whether to hire or promote anyone, or to list services of any contractor, who may have contact with inmates.</li> </ul> <p data-bbox="256 1572 1430 1774">115.17(c): Policy 300 Custody Policy Manual mandates that the Office shall ask all candidates who may have contact with inmates to disclose any conduct described above in written applications or interviews. Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination.</p> <p data-bbox="256 1780 1358 1901">The Office shall make reasonable efforts to contact prior institutions that the candidate has been employed by to inquire about sexual abuse allegations in accordance with 28 CFR 115.17.</p> <p data-bbox="256 1908 1417 2067">Agency reports that in the past 12 months, 48 people were hired who may have contact with inmates who have had criminal background record checks. Interview with Human Resources staff indicates that the facility performs criminal record background checks or considers pertinent civil or Administrative education for all</p>

newly hired employees who may have contact with inmates or employees, who may have contact with the inmates, who are considered for promotions. Additional background checks with the (PHS) personal history statement is utilization to include the 3 required questions on a supplemental form. Agency has failed to provide auditor with copies of completed 3 required questions for custody staff that has been hired or promoted over the past 12 months.

115.17(d): Policy 300 Custody Policy Manual mandates that every person who may have inmate contact as a member or contractor shall, prior to service, undergo a thorough background investigation to verify his/her personal integrity and high ethical standards, and to identify any past behavior that may be indicative of the candidate's unsuitability to perform duties relevant to the operation of the Sheriff's Office. Agency reports that in the past 12 months, One (1) contract for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates.

Interview with Human Resources staff indicates that the facility performs criminal record background checks or considers pertinent civil or Administrative education for all newly hired employees, contractors and volunteers who may have contact with inmates or employees, who may have contact with the inmates, who are considered for promotions. Additional background checks with the (PHS) personal history statement is utilization to include the 3 required questions on a supplemental form. Agency has failed to provide auditor with copies of the criminal records background checks for contractors who might have contact with inmates in order to verify compliance with the PREA Standard.

115.17(e): Policy 300 Custody Policy Manual mandates that the Office shall either conduct a criminal background records check at least every five years on current members who may have contact with inmates or have in place a system for otherwise capturing such information for current employees (28 CFR 115.17). Interview with Human Resources staff indicates that Agency employs the live scan system for contractors and employees. Both Department of Justice and FBI clearances are checked for both contractors and employees. NCIC is maintained in the background file. Agency receives out-of-state notification upon arrest.

115.17(f): Policy 300 Custody Policy Manual mandates that every candidate for employment shall undergo a thorough background investigation to verify his/ her personal integrity and high ethical standards, and to identify any past behavior that may be indicative of the candidate's unsuitability to perform duties relevant to the operation of the Solano County Sheriffs Office (11 CCR 1953). Members or contractors shall be hired who have (28 CFR 115.17):

- (a) Engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 USC § 1997).
- (b) Been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, by overt or implied threats of force, or by coercion, or if the victim did not consent, or was unable to consent or refuse.
- (c) Been civilly or administratively adjudicated to have engaged in the activity described in paragraph {b) of this section.

Interview with Human Resources staff indicates that applicants and employees

who may have contact with them makes about previous misconduct described in written applications for hiring or promotions, and in any interviews or written self-evaluations conducted as part of interviews of current employees. Facility imposes upon employees a continuing affirmative duty to disclose any such previous misconduct to the personal history statement.

115.17(g): Policy 300 Custody Policy Manual mandates that any applicant for employment with this office who knowingly and deliberately makes false statements or omissions of material fact on any application document submitted to the office shall be denied appointment. False statements include but are not limited to deliberately being non-responsive to answers and knowingly providing evasive statements of any type.

115.17(h): Policy 300 Custody Policy Manual mandates that the Office shall make reasonable efforts to contact prior institutions that the candidate has been employed by to inquire about sexual abuse allegations in accordance with 28 CFR 115.17. Interview with Human Resources staff indicates that inform employee applies work another institution, upon request from institution, the facility will provide information on substantiated allegations of sexual abuse or sexual harassment involving the former employee, unless prohibited by law, once the institution provides a signed release of information form from the former employee before they can provide the requested information.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.17(a), 115.17(c), 115.17(d) and corrective action is required.

**Corrective Action Recommended:**

115.17(a): Agency provided auditor with dates of hire, criminal record background dates and 3 required question completion dates for 16 custody staff. Agency failed to provide source documentation (FBI clearance sheets) for all 16 custody staff.

1. Agency required to provide auditor with the following:
  - a). Documented verification of hire date
  - b). National criminal background source documentation (FBI clearance records) for all 16 custody staff in order to verify compliance with this Standard provision.
2. Agency required to provide auditor with copies of the completed 3 Required Questions documentation for all 16 custody staff in order to verify compliance with this Standard provision.
3. Agency required to provide auditor with copies of the promotional 3 Required Questions documentation for the 2 promotional staff identified in the document review worksheet.

115.17(c): Agency has failed to provide auditor with copies of completed 3 required questions for custody staff that has been hired or promoted over the past 12 months.

1. Agency to provide auditor with copies of completed 3 required questions for custody staff that has been hired or promoted over the past 12 months, identified in the document review worksheet.

115.17(d): PREA Standard 115.17(d) requires that Agency completes a criminal background record check be completed before enlisting the services of any contractor who may have contact with inmates.

1. Agency to provide auditor with copies of the national criminal background checks on all contractors identified in the document review sheets to verify compliance with Standard provision 115.17(d).

2. Agency to provide verification that background checks have been completed and cleared prior to contractor obtaining access to the facility or access to inmates unless escorted at all times by custody staff.

**Corrective Action Completion 11/11/23:**

115.17(a): 1/11/23 - Agency provided Offer Letter, FBI clearance verification and 3 required promotional questions for 3 custody staff promoted over the past 12 months as requested by auditor and included requested documentation into the Supplemental File. This included requested documentation to verify compliance with meeting PREA Standard requirements for Criminal Background Dates and 3 required questions completed prior to hire dates for the additional 16 custody staff identified.

115.17(c): 1/11/23 - Agency provided Offer Letter, FBI clearance verification and signed 3 required questions for 3 custody staff promoted over the past 12 months, prior to promotion, as requested by auditor and included requested documentation into the Supplemental File. This included requested documentation to verify compliance with meeting PREA Standard requirements for Criminal Background Dates and 3 required questions completed and signed prior to hire dates for the additional 16 custody staff identified.

115.17(d): 1/11/23 - Agency provided auditor with completed Contractor Records Review Tool accompanied by supporting documentation which verifies criminal background dates, FBI criminal background source for each of the 10 Contractors randomly selected by auditor for document review. Supporting documentation was uploaded to the Supplemental file by Agency and verified PREA compliant by auditor.

The agency/facility has met the requirements of Standard provision(s) 115.17(a), 115.17(c), 115.17(d) completed during the corrective action period. The auditor has

	<p>determined that the agency/facility has met the standard provisions and complies with Standard 115.17.</p>
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<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1469 456">115.18(a): Agency reports that the agency/facility has acquired a new facility or made a substantial expansion or modification to existing facilities since the last PREA audit, whichever is later.</p> <p data-bbox="256 465 1442 624">Interview with Agency Head designee indicates that when designing, acquiring, or planning substantial modifications to facilities the agency considers the effects of such changes on its ability to protect inmates from sexual abuse by use of cameras and staffing plan policies.</p> <p data-bbox="256 633 1453 792">Interview with Facility Commander indicates that the facility considered the effect of expansion the effect of the expansion or modification upon the facility's ability to protect inmates from sexual abuse by increasing staff, video monitoring, increased projects etc to provide sexual safety for inmates and staff.</p> <p data-bbox="256 801 1481 1043">During the physical plant review, auditor had PREA Coordinator and staff to allow review of the complete physical plant. There are a number of housing units and areas throughout the facility that is under construction such as updating cell doors for ADA Compliance. Currently there are only two floors available for housing inmates, ergo the low inmate count. Agency requested to outline the substantial expansion or modification to existing facilities since the last PREA audit.</p> <p data-bbox="256 1081 1430 1198">115.18(b): Agency reports that agency/facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit.</p> <p data-bbox="256 1207 1401 1323">Interview with Agency Head designee indicates that agency uses monitoring technology to enhance the protection of inmates from incidents of sexual abuse, protect areas and privacy issues and balance acknowledging privacy rights.</p> <p data-bbox="256 1332 1465 1574">Interview with Facility Commander indicates that when facility considers using technology to enhance inmates' protection from sexual abuse to maintain safety and security. Privacy issues are identified and covered. Agency requested to provide auditor with specific information regarding installation or update of a video monitoring system, electronic surveillance system, or other monitoring technology since last PREA Audit.</p> <p data-bbox="256 1612 1442 1729">Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.18(a) &amp; 115.18(b) and corrective action is required.</p> <p data-bbox="256 1839 786 1872"><b><u>Corrective Action Recommended:</u></b></p> <p data-bbox="256 1910 1414 1989">115.18(a): Agency to outline the substantial expansion or modification to existing facilities since the last PREA audit.</p> <ol data-bbox="256 2027 1390 2060" style="list-style-type: none"> <li>1. Please upload information to the Supplemental File and include the Standard</li> </ol>

provision associated with this response.

115.18(b): Agency to provide auditor with specific information regarding installation or update of a video monitoring system, electronic surveillance system, or other monitoring technology since last PREA Audit.

1. Please upload information to the Supplemental File and include the Standard provision associated with this response.

**Corrective Action Completion 12/21/22:**

115.18(a): 12/21/22 - PREA Coordinator provided memorandum which informed auditor of the following:

"Several upgrades to the Justice Center Detention Facility (JCDF) have been made, requiring reporting since the last PREA Audit.

A major Water project is currently underway, replacing pipes, valves, showers, sinks, etc. The purpose of this project was to update the water pipes and systems in a 40+ year old jail, some of which were outdated, leaking, lacked the ability to flush consistently, etc. This is a multi-phase project which required shutting down half of the housing units at JCDF, completing in the water project on one side, then shutting down the opposite side. During the first half of the project, the following areas were open for housing:

- Level 2 - ABCD, EF Level 4 - ABC, DEF

Subsequently, these housing units were closed: Level 2 - GHI, JKL

- Level 4 - GHI, JKL

- Medical Units MN, and Z mod were completed in various times throughout the project.

After the first half of the project was completed, the open and closed units switched, and inmates were transferred to the newly updated housing. The project is still ongoing."

115.18(b): 12/21/22 - PREA Coordinator provided memorandum which informed auditor of the following:

"The JCDF Security Electronics began at the end of 2019 and was completed mid-2020. The project consisted of installing new cameras and replacing existing cameras. We increased the number of cameras at JCDF from approximately 100 cameras to 215 cameras, with 365 days of recording at 15 frames per second. New cameras were installed in areas such as the dayrooms, classrooms, visiting areas, recreation yards, safety cells, etc. All cameras are IP based and are on a closed loop network, meaning they can only be viewed from designated viewing stations inside the jail. Privacy masking has been added to sensitive areas such as showers and restrooms."

The agency/facility has met the requirements of Standard provision(s) 115.18(a) &

<p>115.18(b) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.18.</p>
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<p data-bbox="256 188 986 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1476 1420"> 115.21(a): Agency reports that The agency/facility is responsible for conducting administrative and criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol. Policy 606 PREA mandates that An administrative investigation, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment (28 CFR 115.22). Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ). Policy 304 PREA mandates that Specialized investigative training for investigators shall include the uniform evidence protocol to maximize potential for obtaining useable physical evidence; techniques for interviewing sexual abuse victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or referral for prosecution (28 CFR 115.21; 28 CFR 115.34). Interview with 12 randomly selected staff indicates that staff knows and understands agency's protocol for obtaining usable physical evidence if an inmate alleges sexual abuse, which is identified through the 1st responder protocol, which includes ensuring victim and perpetrator are separated and has no access to water, secure the crime scene, notify supervisor and investigation. Staff informs auditor that the Criminal Bureau is responsible for conducting sexual abuse investigation which involves only NIC trained staff to conduct said investigations. </p> <p data-bbox="256 1460 1476 1742"> 115.21(b): Policy 606 PREA mandates that Evidence collection shall be based on a uniform evidence protocol that is adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011 (28 CFR 115.21 ). Protocol is identified in Policy 606 PREA sections 606.7, 606.8 &amp; 606.9. </p> <p data-bbox="256 1783 1476 2065"> 115.21(c): Policy 606 PREA mandates that 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 (28 CFR 115.82). Depending on the severity of the injuries, transportation may occur by a deputy or by ambulance, in either case with appropriate security to protect the staff, the inmate and the public, and to prevent escape. (a) Forensic medical examinations shall be performed as evidentiarily or medically appropriate, without financial cost to the </p>

victim. Where possible, these examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). If neither SAFEs nor SANEs are available, other qualified medical practitioners can perform the examination. The Office shall document its efforts to provide SAFEs or SANEs (28 CFR 115.21 ).

Agency provided auditor with copy of a SAFE/SANE receipt of services provided to verify payment for an Adult Sexual Assault Exam billed to the Solano County Sheriff's Department in 2021 by the Napa Solano SANE/SART.

Agency reports that no SANE/SAFE forensic examinations have occurred during the past 12 months.

Interview with SAFE/SANE Staff indicates that Napa/Solano/Marin SANE/SART Agency serves Solano County Jails. They are on-call 24/7 and provide forensic examinations. Victim advocates are allowed to be present during forensic exams with victim's permission. SART Team provides SDT prophylaxis, pregnancy information and documentation including whatever additional medical needs that are required.

115.21(d): Agency provided a copy of the SafeQuest 2021-2024 MOU which took effect in 7/1/2021 and remains in effect until 6/30/2024. The responsibilities of SafeQuest Solano Inc. is as follows:

- A. Provide a toll-free telephone number inmates can call to report sexual assault or harassment in Sheriff facilities. Installation of the telephone lines at Sheriff facilities will be at Sheriff's expense.
- B. Contact the appropriate Sheriff Facility Commander when a report of sexual assault/harassment is made to them.
- C. Provide Sheriff with a list of current advocates for sexual assault victims and inform the Watch Commander/Incident Commander of the name of the responding advocate.
- D. Maintain confidentiality as required by state standards for certified crisis counselors and NBMC policies and procedures.
- E. Provide any necessary follow-up appointments for counseling requested by inmates.
- F. Comply with all applicable Sheriff's facility policies and procedures as they pertain to safety, security and professional conduct including On-Site Visitation Rules and Guidelines and meet all Clearance Requirements upon entry to any Sheriff facility, as described in Exhibit B, section 10.
- G. Communicate any questions or concerns to the Sheriff PREA Coordinator.
- H. Work with the Sheriff's third party mental health staff and their multidisciplinary team to communicate any medical and mental health conditions, as appropriate, of sexual assault victims and develop individualized treatment plans for these inmates.
- I. Respond to annual inquiries by the Sheriff's contracted PREA Auditor regarding statistical and performance measures described in this agreement.

Interview with the PREA Compliance Manager indicates that if requested by the victim, a victim advocate accompanies and provides emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews per the MOU. SafeQuest is the agency who provides that service. The SART nurse requests the victim advocates prior to the start of the forensic examination.

Of the 5 inmates who Reported a Sexual Abuse in the past 12 months only 1

remained housed in Solano Justice Facility during the onsite audit. This inmate refused to be interviewed by the auditor.

115.2021(e): Policy 606 PREA mandates that If requested by the victim, a victim advocate, a qualified office member, or a qualified community organization staff member shall accompany the victim through the forensic medical examination process and investigatory interviews. That person will provide emotional support, crisis intervention, information, and referrals (28 CFR 115.21 ).

Interview with the PREA Compliance Manager indicates that if requested by the victim, a victim advocate accompanies and provides emotional support, crisis intervention, information , and referrals durinfg the forensic medical examination process and investigatory interviews per the MOU. SafeQuest is the agency who provides that service. The SART nurse requests the victim advocates prior to the start of the forensic examination.

Of the 5 inmates who Reported a Sexual Abuse in the past 12 months only 1 remained housed in Solano Justice Facility during the onsite audit. This inmate refused to be interviewed by the auditor.

115.21(f): N/A - Agency/Facility is responsible for conducting administrative and criminal sexual abuse investigation.

115.21(g): Auditor is not required to audit this provision.

115.21(h): N/A - Agency reports that a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general. Agency always makes a victim advocate from SafeQuest available to victims. SafeQuest to fulfill the requirements outlined in the SafeQuest 2021-2024 MOU which took effect in 7/1/2021 and remains in effect until 6/30/2024.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.21.

<b>115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.22(a): Policy 606 PREA mandates that the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including inmate-on-inmate sexual abuse and staff sexual misconduct). Agency reports that in the past 12 months, 4 administrative allegations of sexual abuse and sexual harassment that were received. Agency reports that referring to allegations received during the past 12 months, all administrative and/or criminal investigations were completed. Upon review, auditor determined there were 5 allegations of sexual abuse. Investigations into each allegation has been completed. Interview with Agency Head designee indicates that Agency ensures administrative or criminal investigations are completed for all allegations of sexual abuse or sexual harassment by way of investigative steps and process between investigation unit, the PREA Coordinator and PREA Manager. Inmate investigations are monitored through Sharepoint database. If another agency refers allegations of sexual abuse or sexual harassment that occurred in one of the Solano County Jail facilities, the designated point of contact is the PREA Manager &amp; PREA Coordinator.</p> <p>115.22(b): Policy 606 PREA mandates that an administrative investigation, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment (28 CFR 115.22). Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ).</p> <p>The following are published on the office's website or by other means, if no website exists:</p> <ol style="list-style-type: none"> <li>1. Office policy governing investigations of allegations of sexual abuse and sexual harassment or the referral of such investigations of sexual abuse or sexual harassment (unless the allegation does not involve potentially criminal behavior)(28 CFR 115.22)</li> <li>2. Information on how to report sexual abuse and sexual harassment on behalf of an inmate (28 CFR 115.54)</li> </ol> <p>Agency's website PREA section states:  The Solano County Sheriff's Office is committed to providing inmates housed at its facilities, the safest environment possible. The Solano County Sheriff's Office has a zero tolerance policy toward sexual abuse and sexual harassment of any kind. Inmates who experience these types of behaviors are strongly encouraged to report the behavior, as it will be investigated thoroughly and completely, whether criminally or administratively, whichever is most appropriate.  Interview with investigative staff indicates that Agency policy requires that</p>

allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Auditor verified investigative policy language is on agency website and states:

The Prison Rape Elimination Act of 2003 was signed into law by President George W. Bush with the intent to provide protection for individuals from prison rape. The act also created the National Prison Rape Elimination Commission and charged it with developing draft standards for the elimination of prison rape. Those standards were published in June 2009, and were turned over to the Department of Justice for review and passage as a final rule. That final rule became effective August 20, 2012.

The Solano County Sheriff's Office is committed to providing inmates housed at its facilities, the safest environment possible. The Solano County Sheriff's Office has a zero tolerance policy toward sexual abuse and sexual harassment of any kind. Inmates who experience these types of behaviors are strongly encouraged to report the behavior, as it will be investigated thoroughly and completely, whether criminally or administratively, whichever is most appropriate.

Inmates experiencing sexual abuse or harassment may report the behavior to any correctional officer, deputy or civilian staff at their facility, or to a third party, such as friend or family member, attorney or advocate, who may make the report for them, or by calling the sexual assault hotline at SafeQuest Solano at 866-487-7233. Inmates can also call SafeQuest toll-free by dialing \*93 from any inmate phone.

If you were assaulted as an inmate at one of our facilities, or someone you know who is currently in custody has been assaulted, you can report the assault by calling Sheriff's Dispatch non-emergency line at 707-421-7090, or the facility where they were assaulted:

- Justice Center Detention Facility 707-784-7100
- Claybank Detention Facility 707-784-7190
- Stanton Correctional Facility 707-784-4830

<https://www.solanocounty.com/depts/sheriff/prea.asp>

115.22(c): N/A - The Agency/facility is responsible for criminal investigations.

115.22(d): Auditor is not required to audit this provision.

115.22(e): Auditor is not required to audit this provision.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.22.

<b>115.31</b>	<b>Employee training</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1474 707">115.31(a): Policy 304 PREA mandates that all members who may have contact with inmates shall receive office-approved training on the prevention and detection of sexual abuse and sexual harassment within these facilities. The Training Manager shall ensure that each member receives training in prevention and intervention techniques, that they have sufficient knowledge to answer any questions the arrestees and inmates may have regarding sexual assault or abuse, and that they are familiar enough with the reporting process to take an initial report of a sexual assault or abuse. The Training Manager shall be responsible for developing and administering this training, covering at minimum (28 CFR 115.31; 28 CFR 115.32):</p> <ul style="list-style-type: none"> <li data-bbox="256 719 1410 790">(a) The zero-tolerance policy for sexual abuse and sexual harassment and how to report such incidents.</li> <li data-bbox="256 801 1302 837">(b) The dynamics of sexual abuse and sexual harassment in confinement.</li> <li data-bbox="256 848 1342 884">(c) The common reactions of sexual abuse and sexual harassment victims.</li> <li data-bbox="256 893 1458 965">(d) Individual responsibilities under sexual abuse and sexual harassment prevention, detection, reporting and response policies and procedures.</li> <li data-bbox="256 976 1347 1012">(e) An individuals' right to be free from sexual abuse and sexual harassment.</li> <li data-bbox="256 1021 1450 1093">(f) The right of inmates and members to be free from retaliation for reporting sexual abuse and sexual harassment.</li> <li data-bbox="256 1104 1369 1140">(g) How to detect and respond to signs of threatened and actual sexual abuse.</li> <li data-bbox="256 1149 1394 1220">(h) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex or gender non-conforming inmates.</li> <li data-bbox="256 1229 1453 1301">(i) How to comply with relevant laws related to mandatory reporting of sexual abuse and sexual harassment to outside authorities.</li> <li data-bbox="256 1312 1091 1348">U) How to avoid inappropriate relationships with inmates</li> </ul> <p data-bbox="256 1357 1474 1509">Agency provided auditor the 8 hour in-class PREA - Custody 2022 PPT presentation. Interview with random sample of 12 staff indicates that staff recall a number of topics discussed in the PREA refresher training and relevant topics discussed in the initial PREA training.</p> <p data-bbox="256 1547 1458 1744">115.31(b): Policy 304 PREA mandates that training shall be tailored according to the sex of the inmates at the facility. Members should receive additional training on security measures and the separation of male and female populations in the same facility if inmates have been reassigned from a facility that houses only male or female inmates.</p> <p data-bbox="256 1756 1458 1908">Auditor's review of the 8-hour PREA training powerpoint verifies that training all staff receive includes discussion regarding both male and female inmates including inmates from the LGBTI community. Agency has provided copies of randomly selected PREA training records for custody staff, contractors and volunteers.</p> <p data-bbox="256 1951 1442 2067">115.31(c): Policy 304 PREA mandates that the Training Manager shall ensure that members undergo refresher training every two years that covers the office's sexual abuse and sexual harassment policies and related procedures. On the years the</p>

member does not receive refresher training, the office shall provide information on sexual abuse and sexual harassment (28 CFR 115.31). Refresher training is provided to employees every 2 years. Agency provided auditor copy of the 4 hour refresher PREA - Custody 2022 new.pdf training. The training covers the following topics:

PREA Guidelines

- Policy & Procedures
- General Orders
- Videos
- Group Interaction

115.31(d): Policy 304 PREA mandates that the Training Manager shall document, through signature or electronic verification, that members have received and understand the training. The Training Unit will maintain training records on all those receiving training in accordance with procedures developed by the Training Manager. Agency has provided PREA training acknowledgements both signed and electronic for randomly selected 16 custody staff, 10 volunteers and 10 contractors.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.31(d).

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.32(a): Agency acknowledges that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. Agency provided auditor with copy of the PREA Contractor Training PPT. Agency indicates that 263 volunteers and contractors who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. Review of the PREA Contractor Training PPT outlines Solano County Sheriff's Zero Tolerance, What to look for, Victim Characteristics, Duty to Report, Mandatory Reporting, Staff's reporting response and process, Review of randomly selected PREA training records acknowledgements for 10 contractors and 10 volunteers found all have been trained in PREA per Standard provision 115.32(a).</p> <p>115.32(b): Agency states that The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. All volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Interview with 4 contractors who have contact with inmates indicates that they received training on the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed of the protocol for reporting such incidents to their supervisor or custody staff. There are currently no volunteers assigned to JCDF.</p> <p>115.32(c): Policy 304 PREA mandates that the Training Manager shall document, through signature or electronic verification, that members have received and understand the training. The Training Unit will maintain training records on all those receiving training in accordance with procedures developed by the Training Manager. Agency provided training documentation proofs for all selected contractors and volunteers which meet Standard provision 115.32(c).</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.32.</p>

<b>115.33</b>	<b>Inmate education</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>115.33(a): Policy 606 PREA mandates that During intake the Office shall notify all inmates of the zero-tolerance policy regarding sexual abuse and sexual harassment, and of at least one way to report abuse or harassment to a public or private entity that is not part of the Office and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to office officials. This allows the inmate to remain anonymous (28 CFR 115.32; 28 CFR 115.51 ). Agency reports that 6215 inmates admitted during past 12 months who were given this information at intake.</p> <p>Interview with Intake Staff determined that stop information about the zero tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. The PREA information form is provided to all inmates and they sign the form to acknowledge receipt and understanding of the PREA education training. Interview with random sample of 11 Inmates determined that during intake, inmates receive a copy of the inmate handbook and PREA pamphlet which provides them with their initial and comprehensive PREA education. The PREA pamphlet is in both English and Spanish. Auditor review of 11 randomly selected inmates determined 1 inmate had non-compliant screening and PREA education records. Intake records provided failed to include intake dates, screening dates and PREA education date for one inmate, intake date and 30 day reassessment.</p> <p>115.33(b): Agency reports that 201 inmates admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake. Auditor review of 11 randomly selected inmates determined 1 inmate had non-compliant screening and PREA education records. Intake records provided failed to include intake dates, screening dates and PREA education date for one inmate, intake date and 30 day reassessment.</p> <p>115.33(c): Agency reports that all inmates are PREA educated within 30 days of intake. Policy 18.001 PREA Requirements 115.41-1 &amp; 2 mandates that "All newly booked inmates shall receive, upon completion of the booking process, a copy of the Inmate Rules, which provides the inmate with information pertaining to avoiding sexual assault while in custody, how to report an assault, and services available to victims of sexual assault, both in and out of custody.</p> <p>Interview with intake staff indicates that who is showing the curtain meters was transferred from other facilities have been educated on agency zero tolerance policy on sexual abuse or sexual harassment intake staff insurers inmates are met with medical when they enter intake and classification. Intake staff interviews inmates and complete intake, screening and PREA education documentation, which is uploaded into ATIMS which includes their comprehensive PREA education forms with their</p>

signature.

115.33(d): Agency reports that Inmate PREA education is available in formats accessible to all inmates, including those who are:

Limited English Proficient (LEP)

Visually impaired

Otherwise disabled

Limited Reading Skills

Page 28 of The Inmate Handbook provides information for inmates to access the Title II Americans with Disability Act of 1990. As states "There are TTY and TDD telephones available within the Solano County Sheriff's Office Detention Facilities.

Inmate requiring the use of either a TTY or TDD telephone must inform the Module Officer, who will obtain the device for use by the hearing impaired or deaf inmate."

Pages 29 & 30 of the Inmate Handbook provides inmates with the following:

Inmate Notice -

"The Solano County Sheriff's Office does not discriminate on the basis of disability in providing access to its facilities, programs, services, and activities. This notice is provided as required by Title II of the Americans with Disabilities Act of 1990. If you have questions, complaints or request for additional information regarding the ADA, forward your inquiry to the designated ADA Division Representative at the facility at which you are housed by completing the ""ADA Request for Accommodation"" form. This form is available upon request from your module officer."

Solano County Sheriff's Office Americans with Disabilities Act (ADA) Policy:

No inmate who is a qualified individual with a disability shall by reason of such disability, be excluded from participation in, or be denied benefits of services, programs, or activities of the jail or be subjected to discrimination.

If an inmate is requesting accommodation in order to participate in a service, program, or activity provided by the jail, the inmate shall notify his / her Module Officer of the request. If an inmate believes that he / she has not been provided with a reasonable accommodation, the inmate may file a formal grievance. Instructions for submitting a formal grievance may be found in this publication under "Inmate Grievances".

#### SOLANO COUNTY ADA COMPLAINT PROCEDURE

If an inmate believes that the Solano County Sheriff's Office has failed to comply with and/or carry out its responsibilities under the American's with Disabilities Act, the inmate may contact the Custody Division ADA Coordinator at 530 Union Ave. Suite 100 Fairfield Ca. 94533, or file a formal grievance. Instructions for submitting a formal grievance may be found in this publication under "Inmate Grievances"

Specific educational materials available for inmates who are hearing impaired or deaf, blind, LEP and sign language interpreters through Language Line, PREA posters in English and Spanish, POINT Book in intake and housing units when requested, limited English proficient, and other resources outlined in Policy 13.015 ADA through the ADA Division Coordinator.

115.33(e): Agency reports they maintain documentation of inmate participation in

PREA education sessions. Agency provided auditor with:

- Admission dates
- PREA signed education acknowledgement dates
- PREA initial and comprehensive education date
- Initial screening documentation

Auditor has yet to receive the 30-day reassessment documentation to verify inmate identified on the Inmate Records Document review sheet were reassessed within 30 days from intake.

115.33(f): The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmate handbooks in both English and Spanish, or other written formats through the inmate handbook and posters. Agency provided auditor copy of the July 2021 Inmate Rule Book which outlines PREA narratives for inmate education on pages 30 & 31 with topics such as:

Your Sexual Safety

What to do if you are victimized

You to Report the Incident

Filing a grievance

Seeking medical help

Confidentiality

Understanding the Investigative process

Counseling Program

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.33(a), 115.33(b), 115.33(e) and corrective action is required.

**Corrective Action Recommended:**

115.33(a): Agency to provide the intake, initial screening, 30-day reassessment date and signed PREA education documentation for inmate identified in the Issue Log for this Standard provision and upload to the Supplemental File

115.33(b): Agency provided PREA Audit Inmate Records Worksheet for records review by auditor. The worksheet provided admission date, PREA acknowledgement date, PREA initial education date, screening date and date of 30-day reassessment for 11 randomly selected inmates. 10 inmates had that information completed. Agency failed to complete this information for 1 inmate.

1. Agency to provide the intake, initial screening, 30-day reassessment date and signed PREA education documentation for inmate identified in the Issue Log for this Standard provision and upload to the Supplemental File.

2. Agency to provide documentation which verifies the intake date, initial screening date and 30-day reassessment date for inmate identified in the Issue Log for this

Standard provision and upload to the Supplemental File.

115.33(e): Agency has provided auditor with documentation which verifies inmate participation in PREA education initial and comprehensive sessions within the time-frames mandated and outlined by Standard 115.33. No 30-day reassessment documentation accompanied this information.

1. Agency to provide auditor with documentation which verifies inmate identified in the Issue Log under this Standard provision, received a screening reassessment within 30 days of intake.

**Corrective Action Completion 1/12/23:**

115.33(a): 12/21/22 - Agency provided the following memorandum to address item #1: During the audit, it was identified that one inmate did not have the intake, initial screening, 30- day reassessment date and signed PREA education documentation uploaded to their file. This inmate was brought into custody on 1/1/22. Follow-up for the 30-day reassessment was conducted with this inmate on 1/8/2022, 1/15/2022, and 1/22/2022. No forms were uploaded to the electronic tracking system. To correct this issue, the Classification Sergeant and Classification Officers were spoken to and reminded to properly upload forms in a timely manner. To our knowledge, this issue has not been repeated.

115.33(b): 12/21/22 - Agency provided the following memorandum to address item #1: During the audit, it was identified that one inmate did not have the intake, initial screening, 30- day reassessment date and signed PREA education documentation uploaded to their file. This inmate was brought into custody on 1/1/22. Follow-up for the 30-day reassessment was conducted with this inmate on 1/8/2022, 1/15/2022, and 1/22/2022. No forms were uploaded to the electronic tracking system. To correct this issue, the Classification Sergeant and Classification Officers were spoken to and reminded to properly upload forms in a timely manner. To our knowledge, this issue has not been repeated.

115.33(e): Solano CJ classification system is electronic-based Classification document responses during inmate screening, PREA training and reassessment, uploads data and signed documents to the electronic system (ATIMS) and destroys the paper documentation. Information is preserved via the electronic documentation system only. In this one case, the classification staff uploaded data to ATIMS, destroyed the paper documentation before uploading the paper documentation into ATIMS. This is the only instance this error occurred with randomly selected inmate intake documentation for document review.

The agency/facility has met the requirements of Standard provision(s) 115.33(a), 115.33(b), 115.33(e) completed during the corrective action period. The auditor has

	<p>determined that the agency/facility has met the standard provisions and complies with Standard 115.33.</p>
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<b>115.34</b>	<b>Specialized training: Investigations</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1474 745">115.34(a): Policy 606 PREA mandates that An administrative investigation, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment (28 CFR 115.22). Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ).</p> <p data-bbox="256 759 1453 875">Agency has investigators take the NIC PREA Learning Center course on Investigation of Sexual Abuse in a Confinement Setting Course through the online PREA Learning Center investigations class PPT.</p> <p data-bbox="256 887 1469 1041">Interview with investigative staff indicates that they receive training specific to conducting sex abuse investigations in a confinement setting. The training was conducted by the National Institute of Corrections which covered the following topics: Sexual abuse and sexual harassment.</p> <ul data-bbox="256 1052 868 1417" style="list-style-type: none"> <li>Victims,</li> <li>Witnesses and suspects,</li> <li>Interviews,</li> <li>Miranda and Garrity warnings,</li> <li>Physical evidence,</li> <li>Electronic monitoring,</li> <li>Crime scene preservation and examination</li> <li>Sexual abuse complaints,</li> <li>Forensic examinations and documentation.</li> </ul> <p data-bbox="256 1458 1425 1574">115.34(b): Agency to provide auditor with copy of the NIC PREA Investigation of Sexual Abuse in a Confinement Setting course curriculum to verify that the course meets Standard provision 115.34(b).</p> <p data-bbox="256 1585 1449 1740">Interview with investigative staff indicates that training topics included techniques were interviewing sexual abuse victims, proper use of Miranda and garry warnings, sexual abuse evidence collection in confinement settings and the criterion evidence required to substantiate a case for Administrative prosecution referral.</p> <p data-bbox="256 1780 1436 1980">115.34(c): Agency provided auditor with copies of the NIC PREA Investigation of Sexual Abuse in a Confinement Setting course certificates of completion for all 11 investigators identified as assigned to investigate sexual abuse cases. Agency has trained all deputies in the NIC course but do not use all deputies for the investigations.</p> <p data-bbox="256 2020 1064 2054">115.34(d): Auditor is not required to audit this provision.</p>

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.34.

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1474 499">115.35(a): Policy 304 PREA mandates that all full- and part-time qualified health care and mental health professionals who work regularly in the detention facilities shall receive all of the member training listed above, as well as training that includes (28 CFR 115.35):</p> <ul style="list-style-type: none"> <li data-bbox="256 506 1310 542">(a) Detecting and assessing signs of sexual abuse and sexual harassment.</li> <li data-bbox="256 548 954 584">(b) Preserving physical evidence of sexual abuse.</li> <li data-bbox="256 591 1433 665">(c) Responding effectively and professionally to victims of sexual abuse and sexual harassment.</li> <li data-bbox="256 672 1377 707">(d) Reporting allegations or suspicions of sexual abuse and sexual harassment.</li> </ul> <p data-bbox="256 714 1458 873">If the qualified health care and mental health professionals employed at these facilities request that a sexual assault forensic examination be conducted, a criminal investigation shall be initiated and will coordinate the examination through the contracted forensic examination medical provider.</p> <p data-bbox="256 880 1482 954">Agency reports that 62% of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy.</p> <p data-bbox="256 960 1482 1377">Interview with medical and mental health staff indicates that both medical and mental health staff indicate they have received PREA training annually. The specialized training that they've received was the PREA training through the WellPath academy and electronic refreshers. The training includes how to preserve physical evidence of sexual abuse, how to preserve respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report and whom to report allegation section of suspicions of sexual abuse and sexual harassment. Agency indicates that 62 medical and mental health care practitioners who work regularly at this facility has received the training required by agency policy. In Standard provision 115.35(c), Agency provided auditor with 58 PREA Training acknowledgements.</p> <p data-bbox="256 1413 1445 1532">115.35(b): N/A - Agency medical staff at the facility do not conduct forensic exams. Interview with both medical and mental health staff indicate they do not conduct forensic examinations.</p> <p data-bbox="256 1568 1449 1686">115.35(c): The agency maintains documentation showing that medical and mental health practitioners have completed the required training. Agency provided auditor with 58 PREA training certification documents.</p> <p data-bbox="256 1722 1474 1881">115.35(d): Agency states they maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere. Agency provided training verification by way of training acknowledgements in Standard provision 115.35(c).</p> <p data-bbox="256 1917 1401 1995">Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.35(a) and corrective action is required.</p>

**Corrective Action Recommended:**

115.35(a): Agency indicates that 62 medical and mental health care practitioners who work regularly at this facility has received the training required by agency policy. In Standard provision 115.35(c), Agency provided auditor with 58 PREA Training acknowledgements.

- 1) Agency to explain why 4 medical/mental health practitioners who work regularly at this facility has not received the required training per agency and PREA policy.
- 2) Agency to provide auditor with the required signed training acknowledgements or electronic documentation certifying all medical & mental health practitioners completed the required PREA training as mandated by Standard 115.35 and Solano County Sheriff's Policy 304 PREA.

**Corrective Action Completion 12/26/22:**

115.35(a): Agency provided signed PREA Training Acknowledgements for 4 Medical/ Mental Health staff who had previously completed the training but the Agency did not provide their PREA Training Acknowledgments to the auditor during the training document review conducted during the pre-audit phase. The fourth staff member no longer works for the agency and, therefore, a signed PREA Training Acknowledgement could not be obtained. Receipt of the 4 missing signed training acknowledgements.

The agency/facility has met the requirements of Standard provision(s) 115.35(a) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.35.

115.41	Screening for risk of victimization and abusiveness
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 262 558 293"><b>Auditor Discussion</b></p> <p data-bbox="256 338 1469 539">115.41(a): Policy 18001 PREA Requirements 115.41 - 1 &amp; 2 mandates that all inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or for being sexually abusive toward other inmates. Any information provided by the inmate is confidential and will be released on a need-to-know basis.</p> <p data-bbox="256 551 1469 707">Inmates who are being transferred out of the facility shall have their files reviewed the day they are to be transferred to another facility. If an inmate is found to have either been victimized or suspected of sexual assault or abuse while in our custody, a notification letter shall be authored and provided to the receiving facility.</p> <p data-bbox="256 741 1469 987">115.42(b): Policy 18001 PREA Requirements 115.41 - 1 &amp; 2 mandates that all inmates shall be screened within 24 hours of arrival for potential vulnerabilities to become victimized or tendencies of acting out with sexually aggressive behavior. The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses and history of prior institutional violence or sexual abuse, as known to the office; in assessing inmates for risk of being sexually abusive.</p> <p data-bbox="256 999 1437 1155">Agency reports 2955 inmates entered the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 72 hours or more and who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility.</p> <p data-bbox="256 1167 1406 1323">Interview with Risk Screening Staff indicates that it makes a screen risk of sexual victimization or risk of sexual sexually abusing other inmates within 72 hours of intake. Screening takes place before inmate is housed and is usually conducted within 24 hours of intake.</p> <p data-bbox="256 1335 1374 1402">Classification process change-PREA memorandum dated 6/1/17 mandates that transferred from one facility to another facility the following needs to occur:</p> <ol data-bbox="256 1413 1310 1536" style="list-style-type: none"> <li>1) Complete the initial inmate pre-screening questionnaire and</li> <li>2) Scan and upload the completed pre-screening questionnaire to the jail management system.</li> </ol> <p data-bbox="256 1547 1469 1749">Interview with 11 randomly selected inmates indicates that when they arrived at the Justice Facility Intake, they were asked if they've been in jail or prison before, whether they have been sexually abused in the past, and whether they identify as being gay, lesbian, or bisexual, and whether they think they might be in danger of sexual abuse while in this facility.</p> <p data-bbox="256 1783 1461 2074">115.41(c): Agency indicates that Risk assessment is conducted using an objective screening instrument. Agency provided auditor with copy of their PREA Screening Checklist &amp; Education Combo Sheet New. Agency also provided auditor with copy of their Classification Questions. Both Screening Checklist and Classification Questions meets the Standard or a weighted objective screening instrument with an override component. The instrument also includes the PREA Comprehensive Education Sheet which verifies that inmate has been provided both initial and comprehensive PREA</p>

education and inmate acknowledges that he or she has the opportunity ask questions of the Classification Officer. Inmate acknowledges receipt of the inmate Brochure and Inmate Rulebook, reviewed the video titled "End of Silence" and "PREA What you need to know" to include review of the Zero-Tolerance Policy. Here is the complete number of components signed for and acknowledged by each inmate after screening, signed by the intake or classification Sergeant:

- "> A 16 minute video titled "PREA: What You Need To Know" may be played in your housing unit.
- > I understand that the Solano County Sheriff's Office has a Zero Tolerance policy for sexual abuse and harassment.
  - > I understand what Sexual Harassment is.
  - > I understand what Sexual Abuse is.
  - > I understand what Staff Voyeurism is.
  - > I understand that I have the right to report sexual abuse privately, safely, and through multiple channels
  - > I understand that I have the right to get help from trained medical and mental health care professionals
  - > I understand that all Sheriff's Office Employees, Volunteers and Contractors (including medical and mental health) are mandatory reporters for any Sexual Abuse/ Harassment.
  - > I understand that sexual activity between a staff member and an inmate can never be consensual and is always against the law.
  - > I understand that I have the right to be protected from sexual abuse.
  - > I have received a brochure titled "END THE SILENCE" & a rule book with PREA information as well as outside reporting telephone numbers (pages 27-29 in the rule book)"

115.41(d): Review of the initial screening, Classification Questions and objective screening instrument includes all criteria identified to assess inmates for risk of sexual victimization per PREA.

Interview with Risk Screening Staff indicates that initial rescreening considers potential or known victim or predator information follow up questions with written responses, and is waited based upon the response. Three more questions provide potential victim or perpetrator information. Based on the additional questions asked to make determination regarding housing and programming.

115.41(e): Review of the initial screening, Classification Questions and objective screening instrument includes all criteria identified to assess inmates for risk of sexual victimization per PREA.

Interview with risk screening staff indicates that initial rescreening considers potential or known victim or predator information follow up questions with written responses, and is waited based upon the response. Three more questions provide potential victim or perpetrator information. Based on the additional questions asked to make determination regarding housing and programming. Initial pre-screening interview was conducted utilizing the perform in medical will pass. The prescreening involves asking questions with regards to the items 1 through 10 as required in Standard

provision 115.41(d).

115.41(f): Policy 18.004 Classification Review mandates that D. Each inmate will be reviewed once every thirty (30) days if there is no specific problem. The Classification Officer will review any change in:

1. Sentence status.
2. Behavior patterns.
3. Incident reports.
4. Rule violations.
5. Disciplinary actions.
6. Any information source:
  - a. Correctional Officer.
  - b. Medical staff.
  - c. Referrals.

Agency indicates that 201 inmates entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more and who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake.

Interview with risk screening staff indicates that inmates are reassessed as needed due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmates risk of sexual victimization or abusiveness. Inmates risk levels are reassessed within 30 days, those that are housed in administrative separation are reassessed every seven days. Review of screening and reassessment documentation provided by Agency found that of the 19 randomly selected inmates, all were reassessed within 30 days and inmates housed in administrative separation were reassessed every 7 days.

115.41(g): Policy 18.004 Classification Review mandates that D. Each inmate will be reviewed once every thirty (30) days if there is no specific problem. The Classification Officer will review any change in:

1. Sentence status.
2. Behavior patterns.
3. Incident reports.
4. Rule violations.
5. Disciplinary actions.
6. Any information source:
  - a. Correctional Officer.
  - b. Medical staff.
  - c. Referrals.

Interview with risk screening staff indicates that inmates are reassessed as needed due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmates risk of sexual victimization or abusiveness.

Interview with random sample of 11 inmates indicate that they were asked the questions at intake as identified in the PREA inmate protocol questionnaire, however, only two inmates recalled being asked these questions a second time by medical.

115.41(h): Policy 18.000 Classification Intake Process mandates that "If, during the interview process, an inmate refuses to answer questions, including those which may pertain to a disability, sexual orientation, past victimization, or their own perception, of vulnerability for abuse, he or she shall not be subject to any discipline for failing or refusing to answer."

Interview with risk screening staff indicates that inmates are not disciplined for refusing to answer questions that pertain to mental, developmental or physical disability, LGBTI, previously experienced sexual abuse or their own perception of vulnerability.

115.41(i): Intake classification systems are maintained through the Jail Management System (JMS) which is maintained by Classification.

Interview with the PREA Coordinator indicates that fast Qetion and the chain of command on need to know basis has access to the facility in order to protect sensitive information from education.

Interview with the PREA Compliance Manager indicates that ATIMS and classification model determines access.

Interview with staff responsible for risk screening indicates that classification and the pre-compliance manager has access only.

During the physical plant review, auditor observed the physical storage area of screening and risk assessment documentation which is maintained in Classification and on ATIMS electronic database. Classification maintains access through this password protected system on computer and Classification offices are maintained in the basement in a secure location. Medical and mental health records are maintained in the Medical floor (2nd floor) in a locked and secure office. Custody staff secures access to the medical floor, access to the offices are secured electronically.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.41.

<b>115.42</b>	<b>Use of screening information</b>
	<p data-bbox="256 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 297"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1461 582">115.42(a): The agency/facility uses information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Agency obtains and maintains the PREA Screening Checklist &amp; Education Combo Sheet New.PDF &amp; Classification Questions to obtain this information.</p> <p data-bbox="256 593 1477 748">Interview with the PREA Compliance Manager indicates that the information for risk screening during intake to keep inmates from being sexually victimized or being sexually abusive through a classification matrix to determine the safest placement for those inmates.</p> <p data-bbox="256 759 1477 958">Interview with risk screening staff indicates that the facility uses this information from the risk screening during intake to keep inmates safe from being sexually or from being sexually abusive. The information is used for housing and programming decisions and keeping perpetrators and victims or potential victims separated and safe..</p> <p data-bbox="256 969 1401 1079">Interview with the PREA Compliance Manager indicates that the facility uses information from risk screening during intake through the classification matrix to determine an inmates' safest placement.</p> <p data-bbox="256 1090 1437 1200">Interview with risk screening staff indicates that information from risk screening during intake is used for housing and programming decisions, keeping perpetrators and victims or potential victims separate and safe.</p> <p data-bbox="256 1249 1461 1404">115.41(b): Policy 18.000 Classification Intake Process 6-5-17.PDF mandates that "When an individual is received at intake as an arrestee or remanded from court, the receiving personnel shall determine the inmate's initial custody status and separate inmates who are violent from inmates who are non- violent."</p> <p data-bbox="256 1415 1477 1615">Interview with risk screening staff indicates that the facility uses this information from the risk screening during intake to keep inmates safe from being sexually or from being sexually abusive. The information is used for housing and programming decisions and keeping perpetrators and victims or potential victims separated and safe.</p> <p data-bbox="256 1626 1437 1780">Interview with risk screening staff indicates that the information for risk screening during intake to keep inmates from being sexually victimized or being sexually abusive through a classification matrix to determine the safest placement for those inmates.</p> <p data-bbox="256 1821 1243 1854">115.42(c): Policy 18.000 Classification Intake Process mandates that:</p> <ol data-bbox="256 1865 1477 2065" style="list-style-type: none"> <li>1. As part of the classification process, each new inmate will be screened within 24 hours for potential vulnerabilities or tendencies to act out with sexually aggressive behavior. Housing assignments will be made accordingly. Inmates identified as at risk for sexual victimization, or with tendencies to act out with sexually aggressive behavior, will be assessed by Mental Health personnel.</li> </ol>

2. Male and female inmates will be housed in separate housing areas. Their sleeping quarters will be separated both visually and acoustically.

3. Inmates who identify as lesbian, gay, bisexual, transgender or intersex shall not be housed based solely on such identification. An inmate's personal views shall also be taken into consideration when deciding where they shall be housed.

4. Completed classification reports will be forwarded to the Classification Sergeant so they are available for follow-up the next day if needed."

Interview with the PREA Compliance Manager indicates that housing and program assignments for transgender or intersex is based upon the classification matrix, safety and securing and housed by gender. Protective housing is provided with no split searches.

Interviews from two Transgender Inmates indicates that screening staff asked their perception of safety and neither was placed in a housing unit only for transgender or intersex inmates. They are allowed to shower without other inmates.

115.42(d): Policy 18.004 Classification Review mandates that:

D. Each inmate will be reviewed once every thirty (30) days if there is no specific problem. The Classification Officer will review any change in:

1. Sentence status.
2. Behavior patterns.
3. Incident reports.
4. Rule violations.
5. Disciplinary actions.
6. Any information source:
  - a. Correctional Officer.
  - b. Medical staff.
  - c. Referrals.

E. The Classification Officer will update and change an inmate's classification when necessary. Any change and the reason for change will be documented. If no change is necessary it shall be documented also.

Interview with PREA Compliance Manager indicates that transgender and a six inmates are reassess to review any threats to safety experience by the inmate every 30 days or sooner.

Interview with risk screening staff indicates that placement & program transgender inmates reassess at least twice each year to review any threats or to safety or experience by the inmate. Staff indicates that transgender inmates are reassessed every 30 days or seven days during their incarceration.

115.42(e): Agency mandates that placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate. Agency conducts case review every 30 days while any inmate is housed in any of the 3 Solano County Jail Detention Facilities per Policy 18.004 Classification Review and outlined in Standard provision 115.42(d) above.

Interviews with PREA Compliance Manager, risk screening staff and transgender inmates indicate that the inmate is given the opportunity to provide their own views with respect to his or her own safety and give serious consideration to their views.

115.42(f): Agency states that Transgender and intersex inmate shall be given the opportunity to shower separately from other inmates. Review of the physical plant verifies all showers are separate showers in view of the custody control booth in each housing unit. Interviews with PREA Compliance Manager, risk screening staff and Transgender inmates verifies auditor observations and provides statement that all inmates can shower separately from other inmates.

115.42(g): Agency states they do not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates as they do not possess such facilities.

Physical plant review and interviews with the PREA Coordinator, PREA Compliance Manager and Transgender inmates verifies the Agency statement of no dedicated facilities, units or wings utilized solely on the basis of an inmate's identification or status.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.42.

<b>115.43</b>	<b>Protective Custody</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>115.43(a): Policy 18.001 Classification PREA Requirements mandates that:</p> <ol style="list-style-type: none"> <li>1. As part of the classification process, each new inmate will be screened within 24 hours for potential vulnerabilities or tendencies to act out with sexually aggressive behavior. Housing assignments will be made accordingly. Inmates identified as at risk for sexual victimization, or with tendencies to act out with sexually aggressive behavior, will be assessed by Mental Health personnel.</li> <li>2. Male and female inmates will be housed in separate housing areas. Their sleeping quarters will be separated both visually and acoustically.</li> <li>3. Inmates who identify as lesbian, gay, bisexual, transgender or intersex shall not be housed based solely on such identification. An inmate's personal views shall also be taken into consideration when deciding where they shall be housed.</li> <li>4. Completed classification reports will be forwarded to the Classification Sergeant so they are available for follow-up the next day if needed."</li> </ol> <p>Policy 606 PREA mandates that Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing 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 segregated housing for less than 24 hours while an assessment is completed. If an involuntary segregated housing assignment is made because of a high risk for victimization, the Facility Commander or 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 (28 CFR 115.43).</p> <p>The facility shall assign these inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, not ordinarily in excess of 30 days. Inmates placed in temporary segregated housing shall continue to have reasonable access to programs, privileges, education and work opportunities. If restrictions are put in place, the Facility Commander shall document the following:</p> <ol style="list-style-type: none"> <li>(a) The opportunities that have been limited</li> <li>(b) The duration of the limitation</li> <li>(c) The reasons for such limitations</li> </ol> <p>Agency states that no inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment.</p> <p>Interview with Facility Commander indicates that Agency policy prohibits placing inmates at high risk of sexual victimization with allege sexual abuse involuntary should get housing in lieu of other housing areas, unless an assessment has been determined that there are no available alternative means of separation from potential abusers. Agency ensures placement in the best housing available to provide access to programming and adequate housing.</p> <p>115.43(b): Policy 606 PREA mandates that if an involuntary segregated housing</p>

assignment is made because of a high risk for victimization, the Facility Commander or 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 (28 CFR 115.43).

The facility shall assign these inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, not ordinarily in excess of 30 days. Inmates placed in temporary segregated housing shall continue to have reasonable access to

programs, privileges, education and work opportunities. If restrictions are put in place, the Facility Commander shall document the following:

(a) The opportunities that have been limited

(b) The duration of the limitation

(c) The reasons for such limitations

Agency states that no inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment

Agency verified there are no inmates in segregated housing for risk of victimization or who alleged to have suffered sexual abuse.

Interview with staff who supervise inmates in segregated housing indicates that inmates placed in segregated housing for protection from sexual abuse sexual abuse or having alleged sexual abuse. They remain to have access to the following: programs privileges education and work opportunities.

115.43(c): Agency states that In the past 12 months, no inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement.

Interview with Facility Commander, staff who supervise inmates in segregated housing both agree that there has been no inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement. During the onsite audit there were no inmates housed at JCDF who were at risk of sexual victimization.

115.43(d): From a review of case files of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facility's concern for the inmate's safety, and (b) the reason or reasons why alternative means of separation could not be arranged. Physical plant review by auditor and statement from PREA Coordinator and Classification staff verifies there have been no inmates at risk of sexual victimization held in involuntary segregated housing in the past 12 months.

115.43(e): Policy 606 PREA mandates that every 30 days, the Facility Commander or designee shall afford each such inmate a review to determine whether there is a continuing need for segregated housing.

Physical plant review by auditor and statement from PREA Coordinator and Classification staff verifies there have been no inmates at risk of sexual victimization held in involuntary segregated housing in the past 12 months.

Interview with staff who supervise inmates in segregated housing indicates that all inmates are reassessed every 7 days for an administrative separation reassessment.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.43(e).

<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.51(a): Policy 606 PREA mandates that Reports can be made in writing or verbally, in the following ways. You can tell correctional staff, medical, mental health, chaplain, contractor, volunteer or any other person that you trust. You can contact SafeQuest Solano by direct dialing # 93 (free call) or (707-422-7345) on any inmate phone. You can tell your attorney or have someone from the outside, such as a friend or family member make the report for you. Personnel are instructed to keep the reported information confidential, and only discuss it with the appropriate officials on a need to know basis.</p> <p>You can also submit a request or file a grievance. This type of grievance is considered an “emergency” grievance.</p> <ul style="list-style-type: none"> <li>• When filing an “emergency” grievance, be very clear about your complaint.</li> <li>• If it is against a staff member, provide the staff members name.</li> <li>• These grievances are acted upon immediately and taken very seriously.</li> <li>• There is no time limit associated with grievances related to sexual abuse.</li> <li>• You are not required to give the grievance to the person in question, nor will you or your grievance be referred to them.</li> <li>• If you need help completing the grievance, you may seek help from others if needed. <b>WARNING:</b> The filing of a grievance in bad faith (attempting to get someone in trouble) is in violation of jail rules. Those found to be in violation will be punished as outlined in the jail rules.</li> </ul> <p>Information concerning the identity of the inmate victim reporting the sexual abuse and the facts of the report itself shall be limited to those who have a need to know in order to make decisions concerning the inmate victim’s welfare and for law enforcement investigative purposes.</p> <p>Interview with random sample of 12 staff indicates that inmates can privately report sexual abuse, sexual-harassment or retaliation by other inmates or staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment by way of reporting to a third-party, staff member, medical or SafeQuest.</p> <p>Interview with random sample of 11 inmates indicates that they can report sexual abuse, sexual harassment or retaliation privately through the SafeQuest hotline of medical request slips and put in locked medical box in the housing units.</p> <p>Information on reporting is posted throughout the facility which outlines public and private entities and reporting availability through the SafeQuest hotline, medical, mental health, 3rd party or letter to facility commander. During the site review, the auditor observed signage posted in each housing unit, intake and throughout other areas in the facility. Observed signage is in both English and Spanish and provides confidentiality language and hotline access number. Auditor tested hotline access in multiple phones throughout the facility. Hotline worked using *93, number answered by operator who connects to SafeQuest advocate. Advocate was interviewed and indicated that the answering service routes phone calls to the available advocates and are not to ask questions of the caller regarding purpose. SafeQuest responds to</p>

anonymous callers and provides emotional support and reporting sexual abuse, sexual harassment or retaliation to the jail if agreed to by the caller. Inmates have the opportunity to write letter or note and place in locked medical box available in any housing unit. Information is only accessed by medical personnel and will be routed to the on-duty Supervisor or Shift Lieutenant for action.

Interview with inmate mail staff indicates inmate mail (outgoing/incoming) is a straight pass from inmate to housing unit officer, then to a secure area where outgoing letters are processed by select Classification Officer. This includes inmates housed in restricted housing. Both regular mail and confidential mail procedures are outlined in Policy 16.01 Mail Policy & Procedure. The housing units do not possess locked mail drop boxes.

During the physical plant review, auditor observed records storage areas for Classification records, medical records and ATIMS electronic records for screening.

Classification records are stored in basement with only access by Classification staff, medical records stored on 2nd floor in electronically locked area in plain view of custody security officer, and electronic screening records are maintained with access only by Classification staff who have electronic security access to screening records.

Agency agrees to place PREA posters in the elevators and in the visitor hallway access for 3rd party reporting.

115.51(b): The agency provides SAFEQUEST as one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency.

Agency has obtained an MOU with SAFEQUEST which is in force from 2021 to 2024. Responsibilities of SAFEQUEST Solano Inc. are as follows:

- A. Provide a toll-free telephone number inmates can call to report sexual assault or harassment in Sheriff facilities. Installation of the telephone lines at Sheriff facilities will be at Sheriff's expense.
- B. Contact the appropriate Sheriff Facility Commander when a report of sexual assault/harassment is made to them.
- C. Provide Sheriff with a list of current advocates for sexual assault victims and inform the Watch Commander/Incident Commander of the name of the responding advocate.
- D. Maintain confidentiality as required by state standards for certified crisis counselors and NBMC policies and procedures.
- E. Provide any necessary follow-up appointments for counseling requested by inmates.
- F. Comply with all applicable Sheriff's facility policies and procedures as they pertain to safety, security and professional conduct including On-Site Visitation Rules and Guidelines and meet all Clearance Requirements upon entry to any Sheriff facility, as described in Exhibit B, section 10.
- G. Communicate any questions or concerns to the Sheriff PREA Coordinator.
- H. Work with the Sheriff's third party mental health staff and their multidisciplinary team to communicate any medical and mental health conditions, as appropriate, of sexual assault victims and develop individualized treatment plans for these inmates.
- I. Respond to annual inquiries by the Sheriff's contracted PREA Auditor regarding statistical and performance measures described in this agreement.

Interview with PREA Compliance Manager indicates that silly provides at least one

way for inmates to report sexual sexual harassment to a public or private entity or office that is not part of the agency through the safe quest hotline, letter from outside of the facility to the facility commander or through Internal Affairs. These procedures enable receipt and the immediate transmission of inmate reports of sexual abuse and sexual harassment to agency officials and uses a process that allows for in the reporting inmate or party to remain anonymous upon request. The entity and procedures are as follows:

SafeQuest gathers information from the inmate and then contacts agency to follow up report for investigative steps to be initiated. Inmate may report sexual abuse a sexual-harassment anonymously should they wish.

Agency never houses inmates detained solely for civil immigration, however, consulate-general addresses in San Francisco is available on page 33 of the inmate handbook.

Interview with random sample of 11 inmates indicates that inmates can report sexual abuse or sexual harassment through an Officer, medical request slips and SafeQuest hotline. Inmates are aware they are able to make a report anonymously.

115.51(c): Policy 606 PREA mandates that Inmates may report incidents anonymously or to any member they choose. In addition, they may report member neglect or violation of responsibilities that may have contributed to sexual abuse, sexual harassment or retaliation. Members shall accommodate all inmate requests to report such allegations. Members shall accept reports made verbally, in writing, anonymously, or from third parties and shall promptly document all verbal reports (28 CFR 115.51; 15 CCR 1029).

Threats or allegations of sexual abuse, sexual harassment, or retaliation, regardless of the source, shall be documented and referred for investigation. Reports shall only be made available to those who have a legitimate need to know, and in accordance with this policy and applicable law (28 CFR 115.61 ).

During intake the Office shall notify all inmates of the zero-tolerance policy regarding sexual abuse and sexual harassment, and of at least one way to report abuse or harassment to a public or private entity that is not part of the Office and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to office officials. This allows the inmate to remain anonymous (28 CFR 115.32; 28 CFR 115.51 ).

Interview with random sample of 12 staff indicates that CHAVEZ made a ledge sex with Mr. sexual-harassment he can or she can do so verbally, in writing, anonymously, and from third parties. Custody staff documents verbal reports immediately or no later than end of shift.

Interview with random sample of 11 inmates indicates that inmates are aware that they can make a report sexual piece of sexual harassment either in person or in writing. They can also make reports without having to give their name.

115.51(d): Policy 606 PREA mandates that any member who becomes aware of an incident of sexual abuse, sexual harassment, or retaliation against inmates or members shall immediately notify a supervisor, who will forward the matter to the appropriate PREA Manager and the PREA Coordinator (28 CFR 115.61 ). Members may

also privately report sexual abuse and sexual harassment of inmates (e.g., report to the Facility Commander) (28 CFR 115.51; 15 CCR 1029). Agency reports that reporting procedures by staff can be written, verbal or contact with facility commanders. Staff are informed of private reporting options through training, PREA Coordinator or PREA Compliance Manager.

Interview with random sample of 12 staff indicates that they can privately report sexual abuse outside the chain of command to the PREA Compliance Manager, Lt, Captain, through SafeQuest hotline and Criminal Investigators.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.51(a) and corrective action is required.

**Corrective Action Recommended:**

115.51(a): During physical plant review, auditor observed lack of PREA posters in elevators, attorney visiting rooms and hallway access to 3rd party visiting hallways.

1. Agency to place 3rd party PREA posters in areas accessible to visitors and attorney visiting such as elevators and visitor access hallways to provide continuous information for reporting sexual abuse, sexual harassment or retaliation on behalf of inmates.
2. PREA signage needs to be placed in Medical visiting area, level 4 and level 2 visiting access hallways.

**Corrective Action Completion 2/17/23:**

115.51(a): 1. Site visit conducted on 2/17/23 to verify Corrective Action compliance for Standard provision 115.51(a). Auditor conducted a walkthrough of the facility and verified the following corrections conducted by the facility:

Only 1 elevator takes visitors to both Levels 2 and 4 where housing, medical and attorney visiting exists. There exists a camera in the elevator to view visitors. Zero-Tolerance poster is maintained in the elevator for all visitors to see. The poster provides Agency's Zero-Tolerance policy to include 3rd party reporting information and phone number to SafeQuest Solano should any 3rd party individual wish to report sexual abuse or sexual harassment. Zero-Tolerance posters can also be viewed in entries and hallways.

2. Signage is visible in the Medical visiting area and in the elevator access to Medical for visitors

The agency/facility has met the requirements of Standard provision(s) 115.51(a) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.51.

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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.52(a): Policy 609 PREA mandates that inmates may submit a grievance regarding an allegation of sexual abuse at any time.</p> <p>Third parties,-including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing such grievances and to file such grievances on behalf of inmates if the inmate agrees to have the grievance filed on his/her behalf. Staff members who receive a grievance filed by a third party on behalf of an inmate shall inquire whether the inmate wishes to have the grievance processed and shall document the inmate's decision.</p> <p>Grievances may be submitted to any staff member and need not be submitted to the member who is the subject of the complaint (d) Staff receiving a grievance shall forward the grievance to a supervisor. Grievances shall not be forwarded to any supervisor who is the subject of the complaint. The supervisor receiving the grievance shall take immediate action if necessary and forward the grievance to the PREA Manager and PREA Coordinator for investigation. The PREA Manager and PREA Coordinator will notify the Facility Commander.</p> <p>(e) The PREA Manager shall ensure that grievances related to sexual abuse are investigated and resolved within 90 days of the initial filing. The PREA Coordinator may grant an extension of _up to 70 days if reasonable to make an appropriate decision. If an extension is granted, the inmate shall be notified and provided a date by which a decision will be made.</p> <p>(f) At any level of the process, including the appeal, if the inmate does not receive a response within the allotted time, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.</p> <p>(g) Inmates may be disciplined for filing a false grievance.</p> <p>115.52(b): Policy 609 PREA mandates that inmates may submit a grievance regarding an allegation of sexual abuse at any time.</p> <p>Third parties,-including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing such grievances and to file such grievances on behalf of inmates if the inmate agrees to have the grievance filed on his/her behalf. Staff members who receive a grievance filed by a third party on behalf of an inmate shall inquire whether the inmate wishes to have the grievance processed and shall document the inmate's decision.</p> <p>Grievances may be submitted to any staff member and need not be submitted to the member who is the subject of the complaint (d) Staff receiving a grievance shall forward the grievance to a supervisor. Grievances shall not be forwarded to any supervisor who is the subject of the complaint. The supervisor receiving the grievance shall take immediate action if necessary and forward the grievance to the PREA Manager and PREA Coordinator for investigation. The PREA Manager and PREA Coordinator will notify the Facility Commander.</p> <p>(e) The PREA Manager shall ensure that grievances related to sexual abuse are investigated and resolved within 90 days of the initial filing. The PREA Coordinator</p>

may grant an extension of \_up to 70 days if reasonable to make an appropriate decision. If an extension is granted, the inmate shall be notified and provided a date by which a decision will be made.

(f) At any level of the process, including the appeal, if the inmate does not receive a response within the allotted time, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

(g) Inmates may be disciplined for filing a false grievance.

Agency policy does not require an inmate to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse.

115.52(c): Policy 609 PREA mandates that grievances may be submitted to any staff member and need not be submitted to the member who is the subject of the complaint. Staff receiving a grievance shall forward the grievance to a supervisor. Grievances shall not be forwarded to any supervisor who is the subject of the complaint.

115.52(d): Policy 609 PREA mandates that the PREA Manager shall ensure that grievances related to sexual abuse are investigated and resolved within 90 days of the initial filing. The PREA Coordinator may grant an extension of \_up to 70 days if reasonable to make an appropriate decision. If an extension is granted, the inmate shall be notified and provided a date by which a decision will be made. In the past 12 months 5 grievances were filed that alleged sexual abuse. In the past 12 months, 5 grievances alleging sexual abuse that reached final decision within 90 days after being filed. No grievance took longer than a 70 days extension to resolve. The agency always notifies an inmate in writing when the agency files for an extension, including notice of the date by which a decision will be made.

During the onsite audit, none of the inmates who submitted the 5 grievances over the past 12 months were housed in the facility. The one inmate housed at the facility who reported a sexual abuse refused to be interviewed by the auditor. None of the 5 grievances provided by agency included a copy of the final decision in response to the grievance submission.

115.52(e): Policy 609 PREA mandates that third parties,-including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing such grievances and to file such grievances on behalf of inmates if the inmate agrees to have the grievance filed on his/her behalf. Staff members who receive a grievance filed by a third party on behalf of an inmate shall inquire whether the inmate wishes to have the grievance processed and shall document the inmate's decision. Sheriff's PREA Website (available to the public) states "Inmates experiencing sexual abuse or harassment may report the behavior to any correctional officer, deputy or civilian staff at their facility, or to a third party, such as friend or family member, attorney or advocate, who may make the report for them, or by calling the sexual assault hotline at SafeQuest Solano at 866-487-7233. There are no grievances alleging sexual abuse filed by inmates n the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline.

115.52(f): Policy 609 PREA mandates that Any inmate who believes he/she or any

other inmate is in substantial risk of imminent sexual abuse may file an emergency grievance with any member. The member shall notify a supervisor who shall determine whether immediate action is reasonably necessary to protect the inmate and shall provide an initial response within 48 hours.

The supervisor shall refer the grievance to the PREA Manager and PREA Coordinator, who will investigate and issue a final decision within five calendar days. Upon receipt of the emergency grievance, the PREA Manager and PREA Coordinator shall notify the Facility Commander.

The initial response and final decision shall be documented and shall include a determination whether the inmate is in substantial risk of imminent sexual abuse and identify actions taken in response to the emergency grievance (28 CFR 115.52).

Agency reports that no emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months.

Agency reports that no grievances alleging substantial risk of imminent sexual abuse were filed in the past 12 months that reached final decisions within 5 days.

115.52(g): Policy 609 PREA mandates that Inmates shall use the grievance process only for legitimate problems or complaints. If there is concern that an inmate is abusing the grievance process, he/she shall be informed that continued behavior may result in disciplinary action. Inmates may be disciplined for filing a false grievance. Agency reports in the past 12 months no inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.52(d), 115.52(e) and corrective action is required.

**Corrective Action Recommended:**

115.52(d): Agency provided auditor with copies of 5 initial grievances submitted in the past 12 months. Said grievances failed to include response to the inmate with the resolution narrative and date of resolution response.

1. Agency to provide auditor with all copies of the 5 grievances that were filed that alleged sexual abuse with the past 12 months.
2. Agency to include all documentation response to the inmate which outlines the resolution narrative and response date.

115.52(e): Auditor to conduct 3rd Party Report testing to SafeQuest.

**Corrective Action Completion 3/13/23:**

115.52(d): Agency provided inmate response documentation for grievances as requested by auditor. Agency provided all grievance response final decisions which were completed and provided to inmate within 60 days of receipt. All response narratives from Agency meets PREA requirements of Standard 115.52.

115.52(e): 3/13/23 - Auditor contacted SAFEQUEST Solano Rape Crisis Center Advocate to request the PREA Audit 3rd Party Test as a family member to report sexual abuse on behalf of a family member incarcerated at JCDF. Advocate indicated transferred me to the Program Director. Program Advocate Director took my request to make the 3rd Party Report allegation of sexual abuse test for PREA Standard 115.54, indicating he is responsible to refer 3rd Party reports to the correctional agency.

By 3/13/23, auditor contacted the Solano CJ PREA Coordinator who indicated the Facility Commander had not received 3rd Party Reporting communication from SAFEQUEST. He contacted the SAFEQUEST Executive Director who immediately trained all staff on the 3rd Party reporting protocol for sexual abuse reporting per the SAFEQUEST MOU. Auditor was informed of the training issue and renewed another 3rd Party test to SAFEQUEST on 3/14/23. PREA Coordinator contacted me later in the day to inform that Solano CJ was contacted by SAFEQUEST this date regarding the PREA notification by the SAFEQUEST Advocate Director who reported the 3rd Party Complaint.

The issues encountered when initially attempting the 3rd Party report have been resolved. The PREA Coordinator indicates Solano County and SAFQUEST will continue to streamline the process going forward.

The agency/facility has met the requirements of Standard provision(s) 115.52(d), 115.52(e) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.52.

<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.53(a): Policy 606 PREA mandates that A victim advocate from a rape crisis center should be made available to the victim. If a rape crisis center is not available, the Office shall make available a qualified member of a community-based organization, or a qualified health care or mental health professional from the Office, to provide victim advocate services. Efforts to secure services from a rape crisis center shall be documented. A rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in (34 USC§ 12511 (b)(2)(C), to sexual assault victims of all ages. A rape crisis center that is part of a government unit may be used if it is not part of the criminal justice system (such as a law enforcement agency) and it offers a level of confidentiality comparable to the level at a nongovernmental entity that provides similar victim services (28 CFR 115.21 ).</p> <p>Inmate Rulebook pg 31 outlines the different levels of emotional support and advocacy available to inmates. PREA Posters both in English &amp; Spanish have been posted in all housing units and throughout the facility. PREA Brochures are provided to inmates during intake and are in both English and Spanish. The facility provides inmates with access to such services by giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes. This information is located on pg 33 in the Inmate Rulebook and page 34 in the electronic version of the Rule Book which can be accessed by the inmates through an IPAD available to all inmates. The facility provides inmates with access to such services by enabling reasonable communication between inmates and these organizations in as confidential a manner as possible on pg 31 of the Inmate Rule Book.</p> <p>Interview with random sample of 11 inmates indicates that none of the inmates could provide name of services outside of the facility for dealing with sexual abuse if they needed it except for SafeQuest. The inmates that read the PREA posters and those who had history of incarceration in state prison in can only recite a response they read from the PREA Poster or information recieved while incarcerated in State Prison. The information provided is that the phones are not monitored, information is confidential between the inmate and the advocate and the call is toll free from he inmate phones.</p> <p>The only inmate housed at the facility during he onsite audit who reported sexual abuse refused to be interviewed by the auditor.</p> <p>115.53(b): Agency indicates that The facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. This information is in the Brochure provided to inmates at intake, the Inmate Rulebook and located on IPAD Tablets and PREA posters located throughout the facility.</p> <p>Interview with random sample of 11 inmates indicates that the PREA posters indicate</p>

that anything said to SafeQuest is private.

The only inmate housed at the facility during the onsite audit who reported sexual abuse refused to be interviewed by the auditor.

115.53(c): Agency maintains a current SafeQuest MOU 2021 - 2024 to provide emotional support services related to sexual abuse. Auditor tested hotline access in multiple phones throughout the facility. Hotline worked using \*93, number answered by operator who connects to SafeQuest advocate. Advocate was interviewed and indicated that the answering service routes phone calls to the available advocates and are not to ask questions of the caller regarding purpose. SafeQuest responds to anonymous callers and provides emotional support and reporting sexual abuse, sexual harassment or retaliation to the jail if agreed to by the caller. PREA posters with access phone hotline, rule book with contact information and information on reporting guidance is available to inmates and 3rd parties.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.53.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.54(a): The Agency or facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment through their website, PREA signs and Inmate Rule Book. Website <a href="https://www.solanocounty.com/depts/sheriff/prea.asp">https://www.solanocounty.com/depts/sheriff/prea.asp</a> Auditor tested hotline access in multiple phones throughout the facility. Hotline worked using *93, number answered by operator who connects to SafeQuest advocate. Advocate was interviewed and indicated that the answering service routes phone calls to the available advocates and are not to ask questions of the caller regarding purpose. SafeQuest responds to anonymous callers and provides emotional support and reporting sexual abuse, sexual harassment or retaliation to the jail if agreed to by the caller.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.54.</p>

<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1484 873">115.61(a): Policy 606 PREA mandates that any member who becomes aware of an incident of sexual abuse, sexual harassment, or retaliation against inmates or members shall immediately notify a supervisor, who will forward the matter to the appropriate PREA Manager and the PREA Coordinator (28 CFR 115.61 ). Members may also privately report sexual abuse and sexual harassment of inmates (e.g., report to the Facility Commander) (28 CFR 115.51; 15 CCR 1029).Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ).</p> <p data-bbox="256 884 1461 1086">Interview with random sample of 12 staff indicates that facility requires all staff to reporting knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility. Reporting includes any retaliation against staff, 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.</p> <p data-bbox="256 1126 1461 1328">115.61(b): Policy 606 PREA mandates that threats or allegations of sexual abuse, sexual harassment, or retaliation, regardless of the source, shall be documented and referred for investigation. Reports shall only be made available to those who have a legitimate need to know, and in accordance with this policy and applicable law (28 CFR 115.61 ).</p> <p data-bbox="256 1339 1461 1406">Interview with random sample of 12 staff indicates that agency/facility procedure for reporting sexual abuse is to the immediate Supervisor.</p> <p data-bbox="256 1447 1436 1648">115.61(c): Policy 606 PREA mandates that medical and mental health practitioners shall ensure that information related to sexual victimization that occurred in an institutional setting is limited to medical and mental health practitioners and other members as necessary to inform about security or management decisions (28 CFR 115.81 ).</p> <p data-bbox="256 1659 1477 2063">Interview with Medical and Mental Health Staff indicates that at the initiation of services to an inmate, medical and mental health staff disclose limitations of confidentiality and their duty to report. They utilize a Wellpath form completed during intake at medical screening. This form is maintain as an electronic medical record. Miracle Mile health staff are required report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to a designated supervisor or official immediately upon learning of it. Neither medical normal health staff medical staff indicated that an inmate interviewed by their staff disclosed sexual abuse during a medical interview. As mandated reporter they informed me and the custody Sergeant was notified and mental health was notified in order to conduct an</p>

evaluation on that subject.

115.61(d): Policy 606 PREA mandates that the health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

Interview with Facility Commander and PREA Coordinator indicates that the facility makes a victim advocate available from a rape crisis center by utilizing SafeQuest, which is the avenue mandated per MOU to provide emotional support through victim advocates. If victim s a vulnerable adult State elder abuse or domestic abuse is notified. Agency does not house persons under 18 years of age, however, should a victim occur under age of 18 years, Child Protection Services (CPS) is notified.

115.61(e): Policy 606 PREA mandates that the facility shall provide information to all visitors or third parties on how they may report any incident, or suspected incident of sexual abuse, or sexual harassment to a member (28 CFR 115.54; 15 CCR 1029).

Threats or allegations of sexual abuse, sexual harassment, or retaliation, regardless of the source, shall be documented and referred for investigation.

Interview with the Facility Commander indicates that all allegations of sexual abuse and sexual harassment, including those from third-party and anonymous sources, or reported directly to designated facility investigators.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.61.

<b>115.62</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.62(a): Policy 608 PREA mandates that the agency has zero tolerance with regard to sexual abuse and sexual harassment in this facility. This office will take appropriate affirmative measures to protect all inmates from sexual abuse and harassment, and promptly and thoroughly investigate all allegations of sexual abuse and sexual harassment. Agency has developed a written plan to coordinate response among staff first responders, medical and mental health practitioners, investigators, and facility management to an incident of sexual abuse. The plan must also outline the Office's approach to identifying imminent sexual abuse toward inmates and preventing and detecting such incidents (28 CFR 115.11; 28 CFR 115.65; 28 CFR 115.62).</p> <p>Agency states that In the past 12 months, no inmate within the agency or facility was found to be a subject to a substantial risk of imminent sexual abuse.</p> <p>Interview with Agency Head designee indicates that I'm learning that it made his subject of substantial risk of him and sexual abuse, the initial action would be safety first. Protect the inmate, subject should be moved to another cell. housing unit or facility.</p> <p>Interview with Facility Commander indicates that if notified that an inmate is subject to a substantial risk of sexual abuse, corrective action is to be taken such as transfer inmate to another cell, transfer to a separate housing unit, keep a ways, and address any specific issues in order to maintain safety. Policy revisions may also be implemented.</p> <p>Interview with random sample of 12 staff indicates that I learned that it may cause it risks in a minute sexual abuse the protocol is to immediately separate the victim from the abuser. Notify the sergeant and classification in order to rehouse the victim or the perpetrator. Conduct an investigation.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.62(a).</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.63(a): Policy 606 PREA mandates that if there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Facility Commander shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation. The Facility Commander shall ensure that the notification has been documented (28 CFR 115.63). Agency reports that in the past 12 months, the facility recieved 5 notices that an inmate was abused while confined at another facility. In each case, a cursory informational interview was conducted and the information was forwarded to the agency in question within 72 hours.</p> <p>115.63(b): Policy 606 PREA mandates that if there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Facility Commander shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation. The Facility Commander shall ensure that the notification has been documented (28 CFR 115.63). Four of the 5 allegations of sexual abuse at a previous facility recieved by the facility in the past 12 months resulted in providing the facility head where the incident occurred notification from the Solano County facility head. Agency failed to follow protocol on one allegation of sexual abuse at a former facility by providing written notification from the Solano County facility head to the facility head where the incident occurred 7 days following receipt of the allegation. Agency provided auditor with copies of 5 written notifications to the head of the facility where the sexual abuse was alleged to have occurred for each of the 5 instances where the facility received an allegation that an inmate was abused while confined at another facility over the past 12 months. Notifications to the facility head where the incident occurred, was made within 72 hours except for one. Agency to provide auditor with explanation as to why notification to facility head where incident was alleged to have occurred was provided 5 days following the received allegation for inmate identified in Issue Log for this Standard provision.</p> <p>115.63(c): Policy 606 PREA mandates that if there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Facility Commander shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation. The Facility Commander shall ensure that the notification has been documented (28 CFR 115.63). Agency provided auditor with copies of 5 written notifications to the head of the facility where the sexual abuse was alleged to have occurred for each of the 5 instances where the facility received an allegation that an inmate was abused while confined at another facility over the past 12 months. Notifications to the facility head where the incident occurred, was made within 72 hours except for one. Agency to provide auditor with explanation as to why notification to facility head where incident was alleged to have occurred was provided 5 days following the received allegation for inmate identified in Issue Log for this</p>

Standard provision.

115.63(d): Policy 606 PREA mandates that the agency has zero tolerance with regard to sexual abuse and sexual harassment in this facility. This office will take appropriate affirmative measures to protect all inmates from sexual abuse and harassment, and promptly and thoroughly investigate all allegations of sexual abuse and sexual harassment.

Agency reports that in the past 12 months, there have been no allegations of sexual abuse the facility received from other facilities.

Interview with Agency Head designee and Facility Commander indicates that the facility where incident occurred receives notification in writing from the Solano CJ facility head that an incident of sexual abuse from that facility was reported to Solano CJ. The facility head where the incident allegedly occurred is notified within 72 hours of receipt of the allegation from the Solano County Jail facility.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.63(b), 115.63(c) and corrective action is required.

**Corrective Action Recommended:**

115.63(b): Agency provided auditor with copies of 5 and notification documentation to the head of the facility where the sexual abuse was alleged to have occurred for each of the 5 instances where the facility received notification that an inmate was abused while confined at another facility over the past 12 months. Notification to the facility head where the incident occurred, was made within 72 hours except for one.

1. Agency to provide auditor with explanation as to why notification to facility head where sexual abuse was alleged to have occurred was provided 7 days following the receipt of the allegation that the below identified inmate alleged sexual abuse at the previous facility.
2. Agency to provide auditor with copy of updated Solano County Policy which includes a larger notification pool including the PREA Manager, PREA Sergeant, and PREA Coordinator for more timely communication and coverage of responsibilities
3. Should JCDF receive an allegation between 12/30/22 and 3/30/23, that an inmate was sexually abused while confined at another facility, Agency will provide auditor with documented verification that JCDF facility head notified head of facility where the alleged abuse occurred no later than 72 hours after receiving the allegation in accordance with PREA Standard 115.63.

115.63(c): Agency provided auditor with copies of 5 and notification documentation to the head of the facility where the sexual abuse was alleged to have occurred for each of the 5 instances where the facility received notification that an inmate was abused while confined at another facility over the past 12 months. Notification to the facility head where the incident occurred, was made within 72 hours except for one.

1. Agency to provide auditor with explanation as to why notification to facility head where sexual abuse was alleged to have occurred was provided 7 days following the receipt of the allegation that the below identified inmate alleged sexual abuse at the previous facility.

**Corrective Action Completion 1/11/23:**

115.63(b): 1. 12/21/22 - Agency provided correspondence from Justice Center Detention Facility Commander to the Warden of AZADC on 9/15/21 to inform the AZADC Facility Commander of the inmate's allegation of sexual assault while housed at ASPC-Florence in 2013 by another inmate. The PREA Coordinator provided auditor a memorandum to explain the situation. The inmate in question entered Solano County's Jail on 9/8/2021. An email from the PREA Manager to the facility where the alleged abuse occurred was not sent until 9/15/2021. In reviewing notes, the Classification officer did not report the prior abuse to the PREA Sergeant until 9/12/2021. On 9/14/2021, the PREA Sergeant contacted the facility in question to verbally advise them and ascertain an email for follow-up. That information was provided to the PREA Manager for official notification to the outside facility. To remedy the situation, at the time of this incident, the Classification officer, and their sergeant, were spoken to and admonished about making timely notifications. Solano County Policy is being updated to include a larger notification pool, including the PREA manager, PREA sergeant, and PREA coordinator, for more timely communication and coverage of responsibilities.

2. 1/11/23 - Agency provided auditor with copy of updated PREA Policy 606.5 Reporting Sexual abuse, Harassment, and Retaliation, which states: "Any member who becomes aware of an incident of sexual abuse, sexual harassment, or retaliation against inmates or members shall immediately notify a supervisor, who will forward the matter to the appropriate Facility Commander, the PREA Coordinator, and the Administrative PREA Sergeant." Policy 606.5.1 narrative includes the statement which states: If there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Facility Commander shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation. The Facility Commander shall ensure that the notification has been documented.

3. Classification officer and Supervisor was retrained and admonished regarding the above non-compliant incident and Post Order Policy to include updated PREA Policy 606.5 and current PREA Policy 606.5.1. Since this was one non-compliant incident regarding notification to the head of the facility where the incident occurred out of five, Agency trained both the Classification officer and Sergeant involved, updated PREA Policy 606.5 and current PREA Policy 606.5.1. This issue has been resolved.

115.63(c): 1. 12/21/22 - Agency provided correspondence from Justice Center Detention Facility Commander to the Warden of AZADC on 9/15/21 to inform the AZADC Facility Commander of the inmate's allegation of sexual assault while housed at ASPC-Florence in 2013 by another inmate. The PREA Coordinator provided auditor a memorandum to explain the situation. The inmate in question entered Solano

County's Jail on 9/8/2021. An email from the PREA Manager to the facility where the alleged abuse occurred was not sent until 9/15/2021. In reviewing notes, the Classification officer did not report the prior abuse to the PREA Sergeant until 9/12/2021. On 9/14/2021, the PREA Sergeant contacted the facility in question to verbally advise them and ascertain an email for follow-up. That information was provided to the PREA Manager for official notification to the outside facility. To remedy the situation, at the time of this incident, the Classification officer, and their sergeant, were spoken to and admonished about making timely notifications. Solano County Policy is being updated to include a larger notification pool, including the PREA manager, PREA sergeant, and PREA coordinator, for more timely communication and coverage of responsibilities.

2. 1/11/23 - Agency provided auditor with copy of updated PREA Policy 606.5 Reporting Sexual abuse, Harassment, and Retaliation, which states: "Any member who becomes aware of an incident of sexual abuse, sexual harassment, or retaliation against inmates or members shall immediately notify a supervisor, who will forward the matter to the appropriate Facility Commander, the PREA Coordinator, and the Administrative PREA Sergeant." Policy 606.5.1 narrative includes the statement which states: If there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Facility Commander shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation. The Facility Commander shall ensure that the notification has been documented.

3. Classification officer and Supervisor was retrained and admonished regarding the above non-compliant incident and Post Order Policy to include updated PREA Policy 606.5 and current PREA Policy 606.5.1. Since this was one non-compliant incident regarding notification to the head of the facility where the incident occurred out of five, Agency trained both the Classification officer and Sergeant involved, updated PREA Policy 606.5 and current PREA Policy 606.5.1. This issue has been resolved.

The agency/facility has met the requirements of Standard provision(s) 115.63(b), 115.63(c) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.63.

<b>115.64</b>	<b>Staff first responder duties</b>
	<p data-bbox="256 188 1015 224"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1458 416">115.64(a): Policy 606 PREA mandates that if an allegation of inmate sexual abuse is made, the first officer to respond shall (28 CFR 115.64 ):</p> <ul style="list-style-type: none"> <li data-bbox="256 425 596 461">(a) Separate the parties.</li> <li data-bbox="256 468 1437 544">(b) Request medical assistance as appropriate. If no qualified health care or mental health</li> <li data-bbox="256 551 1469 627">(c) Establish a crime scene to preserve and protect any evidence. Identify and secure witnesses until steps can be taken to collect any evidence.</li> <li data-bbox="256 633 1474 795">(d) If the time period allows for collection of physical evidence, request that the alleged victim, and ensure that the alleged abuser, do not take any actions that could destroy physical evidence (e.g., washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, eating).</li> <li data-bbox="256 801 1449 918">(e) Consider whether a change in classification or housing assignment for the victim is needed or whether witnesses to the incident need protection, both of which may include reassignment of housing.</li> <li data-bbox="256 925 1331 1001">(f) Determine whether the alleged perpetrator should be administratively segregated or administratively transferred during the investigation.</li> </ul> <p data-bbox="256 1008 1481 1711">Agency reports that in the past 12 months, there were 4 allegations that an inmate was sexually abused. There were not instances where staff were notified within a time period that still allowed for the collection of physical evidence, no instances where where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence, no instances where where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating and no instances where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p data-bbox="256 1718 1469 1921">Interview with Security and Non Security Staff first Responders indicate both staff members can recite the respective 1st Responder Protocols. Both respective staff members carry their 1st Responder Cards which outlines the 1st Responder Protocols and provided them to the auditor during the interview as requested, which exceeds Standard provisions.</p> <p data-bbox="256 1928 1390 2004">During the audit one inmate was housed at the Justice facility who had reported sexual abuse, said inmate refused to be interviewed by the auditor.</p> <p data-bbox="256 2042 1453 2078">115.64(b): Policy 606 PREA mandates that if the first responder is not a correctional</p>

officer, the responder shall request the alleged victim to refrain from any actions that could destroy physical evidence and then immediately notify a correctional officer. Agency reports that there were no instances where a non-security staff member was the first responder and no allegations where the allegation was responded to first by a non-security staff member, the number of times that staff member requested that the alleged victim not take any actions that could destroy physical evidence.

Interview with Security and Non Security Staff first Responders indicate both staff members can recite the respective 1st Responder Protocols. Non-security staff members indicate they first protect the inmate and separate him/her from the victim and situation, contact the Supervisor or custody staff, keep inmate in secure area with no access to water to preserve evidence. Both respective staff members carry their 1st Responder Cards which outlines the 1st Responder Protocols and provided them to the auditor during the interview as requested which exceeds Standard provision.

During the audit one inmate was housed at the Justice facility who had reported sexual abuse, said inmate refused to be interviewed by the auditor.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.64(b).

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="256 264 560 297"><b>Auditor Discussion</b></p> <p data-bbox="256 342 1474 539">115.65: Policy 606 PREA mandates that the agency has zero tolerance with regard to sexual abuse and sexual harassment in this facility. This office will take appropriate affirmative measures to protect all inmates from sexual abuse and harassment, and promptly and thoroughly investigate all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="256 551 1453 707">Agency provided auditor with copy of their Coordinated Response Protocol July 2018 which provides the 1st Responder Protocol, responses from the Facility PREA Manager, Shift Sergeant, Patrol, Criminal Investigators, SafeQuest for advocacy, Solano Sane/Sart at Northbay Medical Center.</p> <p data-bbox="256 719 1481 875">Interview with Facility Commander indicates that Sylvie has a written plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership a response to an incident of sexual abuse.</p> <p data-bbox="256 887 1458 1043">Each security and non-security staff member is PREA trained. Each member has 1st Responder Cards on their person when working at the facility. This includes medical and mental health staff for reference in the event an inmate reports a sexual abuse event.</p> <p data-bbox="256 1077 456 1111"><b>CONCLUSION:</b></p> <p data-bbox="256 1122 1358 1200">Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.65.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.66(a): Agency has provided auditor with the Correctional Supervisors 2020 - 2022 MOU Unit 14. pdf and Correctional Officers 2019 - 2022 MOU Unit 13 122719.pdf. There is no narrative in either of the Collective Bargaining agreements that govern:</p> <p>(1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76; or</p> <p>(2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Interview with Agency Head designee indicates that yes the agency has entered into a renewed collective bargaining agreements for the sergeants and lieutenants pending ratification of the current moment. The agency has the ability to remove alleged staff sexual abuses from contact with any inmate pending an investigation or a determination of whether and to what extent discipline is warranted. That language is not a part of the MOU agreement. It is the pervue of the Administration to supervise staff in that regard.</p> <p>115.66(b): Auditor is not required to audit this provision.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.66.</p>

<b>115.67</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.67(a): Policy 606 PREA mandates that All inmates and members who report sexual abuse or sexual harassment, or who cooperate with sexual abuse or sexual harassment investigations, shall be protected from retaliation. 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 members who fear retaliation, shall be utilized (28 CFR 115.67; 15 CCR 1029). 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 (28 CFR 115.67). Agency has designated 4 specific staff members of the Facility Commanders Custody Division as responsible for monitoring for possible retaliation.</p> <p>115.67(b): Policy 606 PREA mandates that 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 members who fear retaliation, shall be utilized (28 CFR 115.67; 15 CCR 1029). 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 (28 CFR 115.67). Agency reports there have been no instances of retaliation occurring in the past 12 months.</p> <p>Interview with Agency Head designee indicates that inmates are protected from retaliation for sexual abuse or sexual harassment allegations through video monitoring, housing changes and monitoring.</p> <p>Interview with Facility Commander indicates that the different measures he takes to protect inmates and staff from retaliation includes anonymous reporting handled in a confidential manner, protections which involve rehousing, moving staff, changing facility and relocation pending investigation</p> <p>Interview with Designated Staff Member Charged with Monitoring Retaliation indicates that the role he plays in preventing retaliation against inmates and staff report sexual abuse or sexual harassment or who cooperate with sexual abuse or sexual harassment investigations includes retaliation monitoring to ensure no retaliation by other staff or inmates occur. Retaliation, follow up with 90-day monitoring, remove staff from assignment if they are involved in the retaliation, move inmate to another cell, housing unit, or facility to alleviate retaliation. Conduct investigation regarding retaliation issues.</p> <p>Interview with inmate initially placed in Segregated Housing (for risk of sexual victimization indicates that upon intake. Initial placement in surrogate housing on 6/26/2019 due to vulnerability because of age (DOB: 3/10/50), LEP and safety. During interview inmate indicated that he feels safe at this facility now. While in segregated housing she was able to work in the unit and have out of cell opportunities. She was</p>

placed in segregated housing for her safety and remained there for 18 months for protective custody. Inmate is currently housed in general population.

Inmate who Reported a Sexual Abuse refused to be interviewed by auditor.

115.67(c): Policy 606 PREA mandates that The Facility Commander or the authorized designee shall assign a supervisor to monitor, for at least 90 days, the conduct and treatment of inmates or members who report sexual abuse or sexual harassment, as well as inmates who were reported to have suffered sexual abuse, to determine if there is any possible retaliation. The supervisor shall act promptly to remedy any such retaliation. The assigned supervisor should consider inmate disciplinary reports, housing or program changes, negative member performance reviews, or reassignment of members. Monitoring may continue beyond 90 days if needed. Inmate monitoring shall also include periodic status checks. The Facility Commander should take reasonable steps to limit the number of people with access to the names of individuals being monitored and should make reasonable efforts to ensure that members who pose a threat of retaliation are not entrusted with monitoring responsibilities.

Agency reports there have been no instances of retaliation occurring in the past 12 months.

Interview with Facility Commander indicates that measures taken when retaliation is suspected is initiate an AI investigation.

Interview with designated staff member charged with retaliation monitoring indicates that what he looks for to detect possible retaliation is monitor the inmate file for write-ups and classification file for continued movement. Conduct periodic status checks with inmate to monitor any continued retaliation.

115.67(d): Policy 606 PREA mandates that The Facility Commander or the authorized designee shall assign a supervisor to monitor, for at least 90 days, the conduct and treatment of inmates or members who report sexual abuse or sexual harassment, as well as inmates who were reported to have suffered sexual abuse, to determine if there is any possible retaliation. The supervisor shall act promptly to remedy any such retaliation. The assigned supervisor should consider inmate disciplinary reports, housing or program changes, negative member performance reviews, or reassignment of members. Monitoring may continue beyond 90 days if needed. Inmate monitoring shall also include periodic status checks. The Facility Commander should take reasonable steps to limit the number of people with access to the names of individuals being monitored and should make reasonable efforts to ensure that members who pose a threat of retaliation are not entrusted with monitoring responsibilities.

Interview with designated staff member charged with retaliation monitoring indicates that what he looks for to detect possible retaliation is monitor the inmate file for write-ups and classification file for continued movement. Conduct periodic status checks with inmate to monitor any continued retaliation.

115.67(e): Policy 606 PREA mandates that 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 (28 CFR 115.67).

Interview with Agency Head designee indicates that if you need a visual who

cooperates with an investigation expresses fear of retaliation the agency takes measures to protect that inmate against retaliation by placing the victim in a safe location or WeHouse. And continue a 90 day monitoring program.  
Interview with Facility Commander indicates that measures taken to protect inmates and staff of retaliation include anonymous reporting handling confidential manners, investigations of discipline and counseling, rehousing of inmates, movement of staff, changing facilities, relocation pending investigation.

115.67(f): Agency is not required to audit this provision.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.67.

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.68(a): Policy 18.001 PREA mandates that inmates at high risk for sexual victimization shall not be placed in involuntary separated 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. Inmates may be held in involuntary protective custody for less than 24 hours while an assessment is completed.</p> <p>Agency reports that no inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment. No inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement. Agency states that if an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>Interview with Facility Commander indicates that it makes her place in the best housing available to allow them to access programming. It makes it high risk for sexual victimization or whoever left sexual abuse or place involuntary surgery housing only until an alternative means of separation from likely abusers can be arranged. Ordinarily a period of time where inmates at high risk for sexual victimization or with large sexual abuse replacing involuntary segregated housing varies based upon population. Each inmate receives screening every seven days for those that are considered an administrative segregation status. Inmates are continuously reviewed every seven days. There's been no circumstances within the past 12 months in which circuit housing was used protect and inmate who was alleged to have suffered sexual abuse.</p> <p>Interview with staff who supervises inmates in Segregated Housing indicates that when inmates are placed in segregated housing for protection from sexual abuse or after having alleged sexual abuse, they have access to the following programs (to the extent possible):</p> <ul style="list-style-type: none"> <li>- Programs</li> <li>- Privileges</li> <li>- Education</li> <li>- Work Opportunities (MOD Workers)</li> </ul> <p>Should the facility restrict access to programs, priveleges, education or work opportunities, the restriction is documented to identify the opportunities that hae been limited, duration of the limitations and reasons for such limitations. These types of limitations are only restricted for disciplinary reasons. Inmates may be placed in involuntary segregated housing only until alternative means of separation from likely abusers can be arranged. The facility does not separate victim from the abuse, the abuser is always removed pending investigation and inmate is reviewed every 7 days</p>

on Ad-Sep status.

Interview with inmate initially placed in Segregated Housing (for risk of sexual victimization indicates that upon intake. Initial placement in surrogate housing on 6/26/2019 due to vulnerability because of age (DOB: 3/10/50), LEP and safety. During interview inmate indicated that he feels safe at this facility now. While in segregated housing she was able to work in the unit and have out of cell opportunities. She was placed in segregated housing for her safety and remained there for 18 months for protective custody. Inmate is currently housed in general population.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.68(a).

<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.71(a): Policy 606 PREA mandates that an administrative investigation, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment (28 CFR 115.22). Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ). All deputies have been trained in conducting sexual abuse in a confinement setting through National Institute of Corrections course but only 11 deputies are assigned to conduct those types of training. Standard provision 115.34(a) provides the NIC certificate for those deputies who are assigned to investigate sexual abuse cases.</p> <p>Interview with Investigative Staff indicates that in order to initiate an investigation following an allegation of sexual abuse or sexual harassment, custody contacts Field Operations immediately after allegation has been reported. A field deputy is assigned to take the initial report and refers the report to criminal division. If a criminal division investigator is working at the jail, they initiate the investigation. Anonymous or third-party reports of sexual abuse or sexual harassment are investigated in the same manner.</p> <p>115.71(b): Policy 606 PREA mandates that only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ). All deputies have been trained in conducting sexual abuse in a confinement setting through National Institute of Corrections (NIC) course but only 11 deputies are assigned to conduct those types of training. Standard provision 115.34(a) provides the NIC certificate for those deputies who are assigned to investigate sexual abuse cases.</p> <p>Interview with Investigative Staff indicates that opacity staff at Solano County Jail has Reece receive a special training to conduct sex abuse investigations in a confined at setting. The training is is through the the National Institute of Corrections (NIC) website. Training topics include:</p> <ul style="list-style-type: none"> <li>Conducting investigations in a confined setting,</li> <li>sexual abuse and sexual harassment investigations,</li> <li>Conducting interviews of victims, witnesses, suspects,</li> <li>Miranda and Garrity warnings,</li> <li>Obtaining and maintaining physical evidence,</li> <li>Review electronic monitoring</li> <li>Obtaining circumstantial evidence,</li> <li>Reviewing past complaints,</li> <li>Forensic examination evidence collection.</li> </ul>

Evidence required to substantiate a case for administrative or prosecution referral

115.71(c): Policy 606 PREA mandates that an administrative investigation, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment (28 CFR 115.22). Administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases (28 CFR 115.71 ).

Interview with investigative staff indicates that in order to initiate an investigation following an allegation of sexual abuse or sexual harassment, custody contacts Field Operations immediately after allegation has been reported. A field deputy is assigned to take the initial report and refers the report to criminal division. If a criminal division investigator is working at the jail, they initiate the investigation. Anonymous or third-party reports of sexual abuse or sexual harassment are investigated in the same manner. The investigative process is as follows:

- Initial response
- Medical & Mental Health dispatched
- Separate the victim & suspect - no access to water to maintain physical evidence
- Forensic medical examination to be conducted to collect physical evidence
- Medical treatment for victim
- Obtain information regarding allegation through victim, witnesses, perpetrator, video monitoring etc.
- Obtain physical circumstantial evidence
- Obtain DNA evidence
- Write report and document findings.

115.71(d): Agency reports that 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.

Interview with investigative staff indicates that they consult with prosecutors before conducting compelled interviews per PREA mandate.

115.71(e): Policy 606 PREA mandates that all administrative and/or criminal 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. 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 (28 CFR 115. 71 ). 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 (28 CFR 115. 71).

Interviews with investigative staff indicates that they do not require an inmate who alleges sexual abuse to submit to a polygraph examination or truth-telling device as a condition for proceeding with an investigation.

Inmate housed at Justice Facility refused to be interviewed by auditor.

115.71(f): Policy 606 PREA mandates that administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Interview with investigative staff indicates that efforts made during an administrative investigation to determine whether staff actions or fears to act contributed to the sexual abuse is by referring criminal investigation, reviewing video reports, interviews with staff members, interview witnesses, identify the location where the incident occurred, determine if there was a policy violation. Determine necessary actions to take in response to grievances. Administrative investigations are documented in written reports. Internal affairs investigators have NIC certification and obtain the same base data a criminal investigator.

115.71(g): Policy 606 PREA mandates that administrative investigations shall include an effort to determine whether the staff's actions or inaction contributed to the abuse. All administrative and/or criminal 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. Interview with investigative staff indicates that all criminal investigations are documented. Information contained in the reports consists of:

- Initial response
- Medical & Mental Health dispatched
- Separate the victim & suspect - no access to water to maintain physical evidence
- Forensic medical examination to be conducted to collect physical evidence
- Medical treatment for victim
- Obtain information regarding allegation through victim, witnesses, perpetrator, video monitoring etc.
- Obtain physical circumstantial evidence
- Obtain DNA evidence
- Write report and document findings.

115.71(h): Policy 606 PREA mandates that 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 (28 CFR 115. 71 ). Agency reports that no substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last PREA audit which occurred in 2021.

Interview with investigative staff indicates that cases are referred for prosecution when evidence of a substantiated crime has occurred.

115.71(i): Policy 606 PREA mandates that 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 retained in accordance with confidentiality laws.

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 (28 CFR 115.71 ). Agency has provided auditor with copies of investigations conducted over the past 12 months.

115.71(j): Policy 606 PREA mandates that the departure of the alleged abuser or victim from the employment or control of the facility or Office shall not provide a basis for terminating an investigation (28 CFR 115.71 ).

Interview with investigative staff indicates that they proceed with an investigation to completion even when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation into his/her conduct.

115.71(k): N/A - Auditor is not required to audit this provision.

115.71(l): Policy 606 PREA mandates that if the investigation is referred to another agency for investigation, the Office shall request that the investigating agency follow the requirements as provided in 28 CFR 115.21 (a) through (e). The referral shall be documented. The Office shall cooperate with the outside agency investigation and shall request to be informed about the progress of the investigation (28 CFR 115.71).

Interview with Facility Commander indicates that all investigations are done in-house, by the sheriffs office.

Interview with both PREA Coordinator and PREA Compliance Manager indicates that Solano County Jail investigates their own investigations through criminal and internal affairs investigators. If an outside investigation occurred, we would meet regularly for updates on the outside investigation.

Interview with Investigative Staff indicates that when an outside agency investigates an incident of sexual abuse in this facility, they act as liaison between agencies and assist with the investigation if requested. They request that outside agency inform agency criminal investigators of the progress of the investigation.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.71.

115.72	Evidentiary standard for administrative investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.72(a): Policy 606 PREA mandates that all completed written investigations shall be forwarded to the facility PREA Manager and PREA Coordinator. The PREA Coordinator shall review the investigation and determine whether any allegations of sexual abuse or sexual harassment have been substantiated by a preponderance of the evidence (28 CFR 115. 71; 28 CFR 115. 72).</p> <p>Interview with Investigative Staff states that required standard of evidence to substantiate allegations of sexual abuse or sexual harassment is preponderance of the evidence.</p> <p>CONCLUSION: Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.72.</p>

<b>115.73</b>	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.73(a): Policy 606 PREA mandates that the facility PREA Manager, PREA Coordinator or the authorized designee shall inform a victim inmate in writing whether an allegation has been substantiated, unsubstantiated or unfounded. If the Office did not conduct the investigation, the Office shall request relevant information from the investigative agency in order to inform the inmate.</p> <p>Agency indicates that 4 investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months. Of the alleged sexual abuse investigations that were completed in the past 12 months, 4 inmates were notified, verbally or in writing, of the results of the investigation.</p> <p>Interview with Facility Commander indicates that victim of sexual abuse is notified of the outcome of the investigation in writing via PREA Compliance Manager or PREA Coordinator.</p> <p>Interview with Investigative Staff indicates that agency procedures require that an inmate who makes an allegation of sexual abuse must be informed as to whether they all used to be determined to be substantially unsubstantiated or unfounded following the investigation. The free coordinator provides that information to the inmate through the PREA compliance manager.</p> <p>During the onsite audit, the only inmate housed at Justice facility refused to be interviewed by auditor.</p> <p>115.73(b): N/A - Agency /facility is responsible for conducting administrative and criminal investigations.</p> <p>115.73(c): Policy 606 PREA mandates that If a member is the accused (unless the Office has determined that the allegation is unfounded), the inmate shall also be informed whenever:</p> <ul style="list-style-type: none"> <li>(a) The member is no longer assigned to the inmate's unit or employed at the facility.</li> <li>(b) The Office learns that the member has been indicted or convicted on a charge related to sexual abuse within the facility.</li> </ul> <p>Agency reports that there has been no substantiated or unsubstantiated complaint (i.e., not unfounded) of sexual abuse committed by a staff member against an inmate in an agency facility in the past 12 months.</p> <p>115.73(d): Policy 606 PREA mandates that 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. All notifications or attempted notifications shall be documented. 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 (28 CFR 115.73).</p> <p>During the onsite audit, the only inmate housed at Justice facility who reported a sexual abuse refused to be interviewed by auditor.</p> <p>115.73(e): Policy 606 PREA mandates that all notifications or attempted notifications</p>

shall be documented. 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 (28 CFR 115.73).

Agency reports that in the past 12 months, 4 notifications to inmates that were provided pursuant to this standard and all 4 were documented. All 4 disposition letters have been provided to auditor for verification of compliance.

115.73(f): Auditor is not required to audit this provision.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.73.

<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.76(a): Policy 606 PREA mandates that members shall be subject to disciplinary sanctions, up to and including termination, for violating this policy. All discipline shall be commensurate with the nature and circumstances of the acts committed, the member's disciplinary history, and the sanctions imposed for comparable offenses by other members with similar histories.</p> <p>115.76(b): Agency reports that in the past 12 months, no staff from the facility who have violated agency sexual abuse or sexual harassment policies and no staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies. Policy 606 PREA mandates that all terminations for violations of sexual abuse or sexual harassment policies, or resignations by members 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 (28 CFR 115. 76).</p> <p>115.76(c): Policy 606 PREA mandates that members shall be subject to disciplinary sanctions, up to and including termination, for violating this policy. All discipline shall be commensurate with the nature and circumstances of the acts committed, the member's disciplinary history, and the sanctions imposed for comparable offenses by other members with similar histories. Agency reports that in the past 12 months, no staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse).</p> <p>115.76(d): Policy 606 PREA mandates that all terminations for violations of sexual abuse or sexual harassment policies, or resignations by members 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 (28 CFR 115. 76). Agency reports that in the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.76.</p>

<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.77(a): Policy 606 PREA mandates that 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 (28 CFR 115. 77).</p> <p>Agency reports that in the past 12 months, no contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.</p> <p>115.77(b): Policy 606 PREA mandates that 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 (28 CFR 115. 77).</p> <p>Interview with Facility Commander indicates that in the case of any violation of our agency sexual abuse of sexual-harassment policies by contractor or volunteer the agency prohibits entry into the facility pending investigation.</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.77(b).</p>

<b>115.78</b>	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.78(a): Policy 15.002 Inmate Rules and Discipline-Reporting Rule Violations mandates that:</p> <p>A. Rule violations will be classified as major, minor, or verbal warnings. The staff member will document the rule violation and indicate the severity level of the act in the IMS report.</p> <p>B. Major violations will be handled on a formal basis. Violations of Federal, State, County or local statutes, which may lead to criminal prosecution are considered major offenses and will be referred to the immediate supervisor for evaluation. In instances in which an inmate is alleged to have committed a crime, the case will be referred to the appropriate law enforcement officials for prosecution. The supervisor will call dispatch, who in turn will call for a deputy to complete a Crime Report. Additionally, major violations may include behavior that is likely to cause a direct danger to the health and safety of other inmates, the staff or significantly interferes with the order of the facility.</p> <p>C. Minor violations may be handled on an informal or formal basis at the discretion of the officer. Staff members are encouraged to resolve minor incidents on an informal basis through counseling, verbal warning, which shall be logged in the inmate management system (IMS). NOTE: Three (3) or more minor documented violations of prohibited acts may be considered a major violation. Minor violations resulting in any action other than verbal reprimand, counseling, etc., will be handled on a formal basis and require due process.</p> <p>Agency reports that inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. In the past 12 months, there is no record or instances of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility. In the past 12 months, there have been no criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility.</p> <p>115.78(b): Agency reports that sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Policy 606 PREA mandates that all discipline shall be commensurate with the nature and circumstances of the acts committed, the member's disciplinary history, and the sanctions imposed for comparable offenses by other members with similar histories. Policy 15003 Disciplinary Hearing and Basic Rules mandates that facilities will establish authority, guidelines, and time schedules for facility disciplinary procedures to provide fair and impartial hearings and corrective dispositions, within pre-determined limitations, to those found guilty of not conforming to facility rules and regulations.</p> <p>Interview with the Facility Commander indicates that disciplinary sanctions of inmates are subject to following an administrative or criminal finding that the inmate engage in inmate on inmate sexual abuse and sanctions are proportion to the nature and</p>

circumstances of the abuses committed by the inmates disciplinary history, and the sanctions imposed for similar offenses whether inmates with similar histories. Sanctions imposed include inmate being housed in Administrative Segregation, have visiting restricted or use of progressive discipline. Mental disability or mental illness is considered when determining sanctions.

115.78(c): Agency reports that 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. Policy 15003 Disciplinary Hearing and Basic Rules mandates that 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 for PREA incidents.

Interview with the Facility Commander indicates that disciplinary sanctions of inmates are subject to following an administrative or criminal finding that the inmate engage in inmate on inmate sexual abuse and sanctions are proportion to the nature and circumstances of the abuses committed by the inmates disciplinary history, and the sanctions imposed for similar offenses whether inmates with similar histories. Sanctions imposed include inmate being housed in Administrative Segregation, have visiting restricted or use of progressive discipline. Mental disability or mental illness is considered when determining sanctions.

115.78(d): Agency reports that the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse and the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

Interview with medical and mental health staff indicates that medical does not provide therapy, only mental health. Mental health however will provide therapy through a psycho education program only. When therapy is provided, inmate's participation is not a condition of access to programming or other benefits.

115.78(e): Policy 15.002 Inmate Rules and Discipline-Reporting Rule Violations mandates that an inmate may be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

Policy 606 PREA mandates that sexual abuse and sexual harassment between staff, volunteers or contract personnel and inmates is strictly prohibited. The fact that an inmate may have initiated a relationship or sexual contact is not recognized as a defense to violating this policy.

Any incident involving allegations of staff-on-inmate sexual abuse or sexual harassment shall be referred to the Internal Affairs Unit for investigation.

115.78(f): Policy 15003 Disciplinary Hearing and Basic Rules mandates that the Sheriff's Office prohibits disciplinary action for a report of sexual abuse made in good faith and based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence to substantiate the allegation.

115.78(g): Inmate Rule Book July 2021 mandates that any sexual act between

inmates and personnel (even when no objection is raised) is always illegal.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.78.

<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.81(a): N/A - Facility is not a prison.</p> <p>115.81(b): N/A - Facility is not a prison.</p> <p>115.81(c): 115.81(a)/(c) - Wellpath Rape and Sexual Assault Policy mandates that inmates identified as being "at risk" for sexual victimization or abusiveness with no identified immediate medical and/or mental health need, will be referred for medical/mental health screening within 14 days of intake. Custody is responsible for the initial "at risk" screening. However; medical and mental health staff should be alert for the presence of "at risk" criteria in all ongoing interactions with inmates. The following minimum criteria for risk are provided as general information for health services personnel who have inmate contact.</p> <p>Agency reports that in the past 12 months, 14 percent of inmates who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services. Agency provided auditor with copy of Inmate Sampling documentation which indicates 21 inmates reported prior sexual victimization over the past 12 months and was provided followup meetings with mental health practitioners within 14 days of intake. The remainder 20 inmates were referred to mental health and either obtained followup with mental health provider, was released within 4 days following intake or declined followup meeting with a mental health provider.</p> <p>Interview with inmate who disclosed sexual victimization at risk screening indicated she was offered meeting with mental health practitioner but declined as it happened years ago and she is being released after she talks with me. She does not wish to discuss it.</p> <p>Interview with staff responsible for risk screening indicates that intake offers a follow-up meeting with a medical and/or mental health practitioner if an inmate has experienced prior sexual victimization. Note is filed with medical and mental health and documented in ATIMS ASAP. Review of all case records provided, 1 inmate was found to have followup meeting with mental health provider 18 days following intake.</p> <p>115.81(d): Agency indicates that the provided PREA Screening Checklist &amp; Education Combo Sheet New is not strictly limited to medical and mental health practitioners, the information is shared with Classification officers and the PREA Compliance Sergeant who is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.</p> <p>During the physical plant review, auditor observed the physical storage area of screening and risk assessment documentation which is maintained in Classification and on ATIMS electronic database. Classification maintains access through this password protected system on computer and Classification offices are maintained in</p>

the basement in a secure location. Medical and mental health records are maintained in the Medical floor (2nd floor) in a locked and secure office. Custody staff secures access to the medical floor, access to the offices are secured electronically.

115.81(e): Agency provided auditor with copy of the PREA Acknowledgement for Adults which provides informed consent and duty to report prior to the initiation of services to be signed by both inmate and practitioner. The informed consent form is obtained only if the incident happened within the last 72 hours per WellPath policy. Interview with medical and mental health staff indicates that they obtain informed consent from inmates before reporting about sexual abuse it's the sexual victimization that did not occur in institutional setting. This consent form is the well path receiving screening acknowledgment form where the inmate must sign along with the practitioner. There is no separate informed consent process for inmates under the age of 18 as no inmates under age of 18 years are housed in Solano County Jails.

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.81(c) and corrective action is required.

**Corrective Action Recommended:**

115.81(c): Agency indicates it provided 14 inmates with prior sexual abuse history followup meeting with mental health practitioner within 14 days of intake screening. Auditor found that one inmate was seen by mental health provider 18 days after intake screening, non-compliant with Standard provision 115.81(a)-2.

1. Agency to provide explanation why inmate identified in Issue Log under Standard 115.81(a)/(c), was seen by mental health practitioner 18 days after intake (6/7/22). There were no notes to accompany the Q#9 Inmates Prior Victimization excel sheet provided to auditor prior to the onsite audit.

**Corrective Action Completion 12/21/22:**

115.81(c): 12/21/22 - Agency provided auditor with memorandum from the PREA Coordinator explaining the late follow-up meeting inmate had with a mental health provider following intake as inmate claimed to be a victim of sexual abuse. "A review of all case records provided, one inmate was found to have a follow-up meeting with mental health provider 18 days following intake, instead of the 14 days required in PREA Standard 115.81(c).

In a review of Inmate's records, Inmate refused to answer PREA questions during intake on 06/07/2022 and 6/08/2022 and did not identify as a victim of previous sexual abuse. Inmate was not identified as being ""at risk"" for sexual victimization or abusiveness at that time. During PREA re-screening on 7/11/2022 due to being housed at another facility, inmate stated they were the victim of sexual victimization. Inmate was seen by Mental Health on 7/15/2022 and was monitored throughout her

confinement."

The agency/facility has met the requirements of Standard provision(s) 115.81(c) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.81.

<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1469 748">115.82(a): Agency indicates that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services to include that the nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Agency reports that there are medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.</p> <p data-bbox="256 757 1469 958">Interview with medical and mental health staff indicates that inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of the services provided or determine reporting according to medical and mental health staff's professional judgment.</p> <p data-bbox="256 967 1355 1043">Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.</p> <p data-bbox="256 1084 1469 1240">115.82(b): Agency indicates that if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners. Interview with security staff 1st Responders indicates that security staff:</p> <ul data-bbox="284 1290 1469 1491" style="list-style-type: none"> <li>a. Separates the alleged victim and abuser, keep victim in a safe place</li> <li>b. Requests the last victim not take any actions that can destroy physical evidence</li> <li>c. Ensure that the alleged abuser does not take any above it actions that can destroy physical evidence</li> <li>d. Immediately notify supervisor and medical and mental health practitioners</li> </ul> <p data-bbox="256 1500 1278 1536">Interview with non-security staff member 1st Responders indicates that:</p> <ul data-bbox="284 1545 1469 1747" style="list-style-type: none"> <li>a. Separates the alleged victim and abuser, keep victim in a safe place</li> <li>b. Requests the last victim not take any actions that can destroy physical evidence</li> <li>c. Ensure that the alleged abuser does not take any above it actions that can destroy physical evidence</li> <li>d. Immediately notify supervisor or custody staff.</li> </ul> <p data-bbox="256 1787 1461 1863">115.82(c): Policy 606 PREA mandates that examination, testing, and treatment shall include the following (15 CCR 1206):</p> <p data-bbox="256 1872 1461 2074">(a) Forensic medical examinations shall be performed as evidentiarily or medically appropriate, without financial cost to the victim. Where possible, these examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SAN Es). If neither SAFEs nor SANEs are available, other qualified medical practitioners can perform the examination. The Office shall document its</p>

efforts to provide SAFEs or SAN Es (28 CFR 115.21 ).

(b) If requested by the victim, a victim advocate, a qualified office member, or a qualified community organization staff member shall accompany the victim through the forensic medical examination process and investigatory interviews. That person will provide emotional support, crisis intervention, information, and referrals (28 CFR 115.21 ).

(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).

(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.

(e) Victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

(g) Victims shall be provided with 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 (28 CFR 115.83).

(h) 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 (28 CFR 115.82; 28 CFR 115.83).

(i) The health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).

(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.

(e) Victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

(g) Victims shall be provided with 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 (28 CFR 115.83).

(h) 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 (28 CFR 115.82; 28 CFR 115.83).

(i) The health authority or mental health staff shall obtain informed consent from

inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

Interview with medical and mental health staff indicates that all victims of sexual abuse are offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis upon referral to SAFE/SANE nurse for assessment and forensic examination.

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.82(d): Policy 606 PREA mandates that 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 (28 CFR 115.82; 28 CFR 115.83).

Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.82(a) and corrective action is required.

**Corrective Action Recommended:**

115.82(a): The Inmate Sample provided for this Standard provision meets Standard provision 115.79, not Standard provision 115.82.

1. Agency to provide appropriate medical secondary materials which verifies timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.

**Corrective Action Completion 12/20/22:**

115.82(a): Auditor error. Secondary Material Agency provided is the initial Inmate Sample, which provides list of inmates who disclosed prior sexual victimization during intake screening. The list opens to indicate an expanded excel spreadsheet which identifies the inmates who disclosed prior sexual victimization, intake date, inmate number, mental health referral date, mental health provider, date seen by mental health provider and referral notes.

The agency/facility has met the requirements of Standard provision(s) 115.82(a) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.82.

<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.83(a): Policy 606 PREA mandates that examination, testing, and treatment shall include the following (15 CCR 1206):</p> <p>(a) Forensic medical examinations shall be performed as evidentiarily or medically appropriate, without financial cost to the victim. Where possible, these examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SAN Es). If neither SAFEs nor SANEs are available, other qualified medical practitioners can perform the examination. The Office shall document its efforts to provide SAFEs or SAN Es (28 CFR 115.21 ).</p> <p>(b) If requested by the victim, a victim advocate, a qualified office member, or a qualified community organization staff member shall accompany the victim through the forensic medical examination process and investigatory interviews. That person will provide emotional support, crisis intervention, information, and referrals (28 CFR 115.21 ).</p> <p>(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).</p> <p>(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.</p> <p>(e) Victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.</p> <p>(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.</p> <p>(g) Victims shall be provided with 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 (28 CFR 115.83).</p> <p>(h) 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 (28 CFR 115.82; 28 CFR 115.83).</p> <p>(i) The health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).</p> <p>(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).</p> <p>(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.</p> <p>(e) Victims shall be offered information about, and given access to, emergency</p>

contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

(g) Victims shall be provided with 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 (28 CFR 115.83).

(h) 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 (28 CFR 115.82; 28 CFR 115.83).

(i) The health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

During the physical plant review, auditor observed a number of medical staff entering the housing units to provide medication to inmates and some arrived on-call to provide medical assessment and health evaluation to inmates. Review of the medical treatment units found practitioners providing treatment in the same manner as hospital staff. Auditor conducted informal interview with medical staff in intake who meets with inmates when they enter the facility for Booking. The practitioner asks the inmate questions from the WellPath Receiving Screening sheet, which asks 11 specific questions which outlines the responsibilities of the medical practitioners, sexual assault awareness, obtaining medical and mental health access and informing inmates that medical/mental health staff are mandatory reporters. The form indicates that the mandatory reporters are required to report immediately any knowledge, suspicion, or information pertaining to an incident of sexual abuse or sexual harassment that occurred within the facility; and with the inmate's consent any victimization that occurred in the community, unless the inmate is a minor and then health staff are mandated reporters regardless of location. Inmates are to acknowledge these questions and sign the form with accompanying WellPath practitioners signatures. These forms are maintain in the inmate's medical and classification records. Auditor observed medical and mental health practitioners providing counseling to inmates throughout the facility.

115.83(b): Policy 606 PREA mandates that examination, testing, and treatment shall include the following (15 CCR 1206):

(a) Forensic medical examinations shall be performed as evidentiarily or medically appropriate, without financial cost to the victim. Where possible, these examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SAN Es). If neither SAFEs nor SAN Es are available, other qualified medical practitioners can perform the examination. The Office shall document its efforts to provide SAFEs or SAN Es (28 CFR 115.21 ).

(b) If requested by the victim, a victim advocate, a qualified office member, or a qualified community organization staff member shall accompany the victim through

the forensic medical examination process and investigatory interviews. That person will provide emotional support, crisis intervention, information, and referrals (28 CFR 115.21 ).

(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).

(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.

(e) Victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

(g) Victims shall be provided with 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 (28 CFR 115.83).

(h) 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 (28 CFR 115.82; 28 CFR 115.83).

(i) The health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

(c) Provisions shall be made for testing the victim for sexually transmitted diseases (28 CFR 115.82).

(d) Counseling for the treatment of sexually transmitted diseases, if appropriate, shall be provided.

(e) Victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

(f) Victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

(g) Victims shall be provided with 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 (28 CFR 115.83).

(h) 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 (28 CFR 115.82; 28 CFR 115.83).

(i) The health authority or mental health staff shall obtain informed consent from inmates before reporting information to members about prior sexual victimization that occurred somewhere other than an institutional setting, unless the inmate is under the age of 18 (28 CFR 115.81).

Interview with medical and mental health staff indicates that evaluation and treatment of inmates who have been victimized entails trauma assessment therapy, interventions, treatment planning and referral resources.

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.83(c): Agency reports that the facility shall provide such victims with medical and mental health services consistent with the community level of care.

Interview with medical and mental health indicates that during intake health inventory and exams and inmates are asked about history of sex abuse. If not acute, they are referred to mental health if a acute, they are referred to the hospital for urgent evaluation. Medical and mental health services are offered consistent with community level of care.

115.83(d): Policy 606 PREA mandates that victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.83(e): Policy 606 PREA mandates that victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services (28 CFR 115.83). This shall be done in a timely manner.

Interview with medical and mental health staff indicates that the pregnancy results from sexual abuse one cars rated, victims are given timely information and access to all lawful pregnancy - related services. Search victims are provided this information and access to services on an urgent basis or on notification by staff

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.83(f): Policy 606 PREA mandates that victims shall be offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment for sexually transmitted diseases (28 CFR 115.82; 28 CFR 115.83). This shall be done in a timely manner.

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.83(g): Policy 606 PREA mandates that 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 (28 CFR 115.82; 28 CFR 115.83).

Inmate housed at the Justice facility who reported sexual abuse refused to be interviewed by auditor.

115.83(h): N/A - Facility is a Jail and this Standard provision does not apply.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.83.

<b>115.86</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.86(a): Policy 606 PREA mandates that an incident review shall be conducted at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. The review should occur within 30 days of the conclusion of the investigation (28 CFR 115.86). Agency provided educational slides identified as Sexual Abuse Investigation. Agency also provided PREA Investigation Report dated 3/25/22 which occurred at Stanton Correctional Facility on an inmate on inmate sexual abuse allegation which was found to be substantiated. Case was investigated by investigative staff who is certified to conduct sexual abuse investigations in a confinement setting. In the past 12 months all criminal and /or administrative investigations of alleged sexual abuse have been completed at the Justice facility excluding only unfounded incidents. Agency indicates there have been no sexual abuse investigations found to be substantiated or unsubstantiated. Auditor's review of all sexual abuse case investigations conducted in the past 12 months verify all sexual abuse allegations have been determined to be unfounded.</p> <p>115.86(b): Policy 606 PREA mandates that An incident review shall be conducted at the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. The review should occur within 30 days of the conclusion of the investigation (28 CFR 115.86). In the past 12 months all criminal and /or administrative investigations of alleged sexual abuse have been completed at the facility excluding only unfounded incidents. Agency indicates there have been no sexual abuse investigations found to be substantiated or unsubstantiated. Auditor's review of all sexual abuse case investigations conducted in the past 12 months verify all sexual abuse allegations have been determined to be unfounded.</p> <p>115.86(c): Policy 606 PREA mandates that 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. Interview with Facility Commander indicates that the facility has an incident review team and documents its findings in the Sharepoint database. At a minimum, the team consists of the PREA Coordinator, PREA Compliance Manager, Investigators, Medical Facility Commander and Watch Sergeants.</p> <p>115.86(d): Policy 606 PREA mandates that the review team shall prepare a report of its findings, including any determinations made pursuant to this section and any recommendations for improvement. The report shall be submitted to the PREA Coordinator. The Facility Commander or the authorized designee shall implement the recommendations for improvement or document the reasons for not doing so. Interview with the Facility Commander and incident review team member indicates that the review team considers where are the incidents or a litigations was motivated by race ethnicity or gender identity, examine the area in the facility where the incident occurred, assesses the adequacy of staffing levels in area during different</p>

shifts, assesses whether monitoring technology could be employed or augmented to supplement supervision by staff.

Interview with the PREA Compliance Manager indicates that the facility prepares a report for his findings from the reviews, including any determinations per the standard 15.86 and any recommendations for improvement. The reports are forwarded to the PREA Compliance Manager for review. PREA Compliance Manager indicates to auditor that they have not noticed any trends. Actions taken after the report has been submitted includes policy changes if needed, review for blind spots, protective areas, staff program practices.

115.86(e): Policy 606 PREA mandates that The review team shall prepare a report of its findings, including any determinations made pursuant to this section and any recommendations for improvement. The report shall be submitted to the PREA Coordinator. The Facility Commander or the authorized designee shall implement the recommendations for improvement or document the reasons for not doing so. Agency indicates there have been no sexual abuse investigations found to be substantiated or unsubstantiated. Auditor's review of all sexual abuse case investigations conducted in the past 12 months verify all sexual abuse allegations have been determined to be unfounded.

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.86.

115.87	Data collection
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="256 264 558 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1469 667">115.87(a): Policy 606 PREA mandates that the Office shall conduct an annual review of collected and aggregated incident-based sexual abuse data. The review should include, as needed, data from incident-based documents, including reports, investigation files and sexual abuse incident reviews (28 CFR 115.87). Policy contains as standardized set of definitions. Agency to provide auditor with a copy of the standardized instrument and set of definitions utilized to collect and maintain accurate, uniform data for every allegation of sexual abuse at facilities under its direct control in order to verify compliance with Standard provision 115.87(a)-1.</p> <p data-bbox="256 707 1461 779">115.87(b): Policy 606 PREA mandates that the Office shall conduct an annual review of collected and aggregated incident-based sexual abuse data.</p> <p data-bbox="256 819 1481 1016">115.87(c): Agency reports that they use a standardized instrument which includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. Agency to provide copy of said instrument in order to provide verification of compliance with Standard provision 115.87(c)-1</p> <p data-bbox="256 1057 1453 1218">115.87(d): Policy 606 PREA mandates that 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 (28 CFR 115.71 ).</p> <p data-bbox="256 1258 1453 1294">115.87(e): N/A - Agency states they do not contract for the confinement of inmates.</p> <p data-bbox="256 1335 1449 1496">115.87(f): Agency states they provided the Department of Justice (DOJ) with data from the previous calendar year upon request. Agency to provide auditor with copy of the data provided, in response to request of the DOJ from the previous calendar year for verification of compliance with Standard provision 115.87(f).</p> <p data-bbox="256 1599 1441 1715">Based upon the analysis of evidence, the auditor finds the facility is not fully compliant with Standard provision(s) 115.87(a), 115.87(c), 115.87(f) and corrective action is required.</p> <p data-bbox="256 1823 791 1859"><b><u>Corrective Action Recommended:</u></b></p> <p data-bbox="256 1899 1469 2060">115.87(a): Agency to provide auditor with a copy of the standardized instrument and set of definitions utilized to collect and maintain accurate, uniform data for every allegation of sexual abuse at facilities under its direct control in order to verify compliance with Standard provision 115.87(a)-1.</p>

115.87(c): Agency reports that they use a standardized instrument which includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. Agency to provide copy of said instrument in order to provide verification of compliance with Standard provision 115.87(c)-1

115.87(f): Agency to provide auditor with copy of the data provided, in response to request of the DOJ from the previous calendar year for verification of compliance with Standard provision 115.87(f).

**Corrective Action Completion 1/11/23:**

115.87(a): 1/12/23 - Blank Survey of Sexual Victimization (SSVIA) form uploaded to the Supplemental File. This form is utilized to track allegations of sexual abuse at all facilities under Agency's control to collect the data for Annual Report and when data is requested from the DOJ.

115.87(c): 12/21/22 - Agency provided auditor with copy of the Survey of Sexual Violence they utilize to answer all questions of the SSVIA for the DOJ should documentation be required in response to their request for said documentation.

115.87(f): 1/11/23 - PREA Coordinator informed auditor that DOJ has not requested data from previous calendar year. The initial positive response to the pre-audit questionnaire was responded to in error.

The agency/facility has met the requirements of Standard provision(s) 115.87(a), 115.87(c), 115.87(f) completed during the corrective action period. The auditor has determined that the agency/facility has met the standard provisions and complies with Standard 115.87.

<b>115.88</b>	<b>Data review for corrective action</b>
	<p data-bbox="256 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="256 264 557 300"><b>Auditor Discussion</b></p> <p data-bbox="256 340 1474 622">115.88(a): Upon review of the 1/20/22 Annual Report provided by Agency, the agency reviews data collected and aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: • Identifying problem areas; • Taking corrective action on an ongoing basis; and • Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</p> <p data-bbox="256 633 1474 790">Interview with Agency Head designee indicates that the incident-based sexual abuse data is utilized to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. We use an after-action review to ensure policies and actions are updated.</p> <p data-bbox="256 801 1474 1003">Interview with PREA Coordinator indicates that the agency reviews data collected and aggregated pursuant to standard 115.87, in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies in training. Agency takes corrective action on ongoing basis based upon this data, such as trends and patterns and areas that can be corrected.</p> <p data-bbox="256 1014 1474 1126">Interview with PREA Compliance Manager indicates that The agency prepares an annual report of findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</p> <p data-bbox="256 1167 1474 1279">115.88(b): The annual report includes a comparison of the current year's data and corrective actions with those from prior years and an assessment of the agency's progress in addressing sexual abuse.</p> <p data-bbox="256 1319 1474 1395">115.88(c): Agency states the annual report is readily available to the public at least annually through it's website and approved by the Agency Head:</p> <p data-bbox="256 1435 1262 1547"> <a href="https://www.solanocounty.com/depts/sheriff/prea.asp">https://www.solanocounty.com/depts/sheriff/prea.asp</a>  <a href="https://www.solanocounty.com/civicax/filebank/blobdload.aspx?blobid=36365">https://www.solanocounty.com/civicax/filebank/blobdload.aspx?blobid=36365</a> </p> <p data-bbox="256 1588 1474 1664">Interview with Agency Head designee indicates that he approves annual reports written pursuant to standard 115.88.</p> <p data-bbox="256 1704 1474 1946">115.88(d): Agency reports that when they redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of the material redacted. Review of the 2022 Annual Report indicates narrative in the end of the second paragraph of page #2 which indicates that nature of material redacted.</p> <p data-bbox="256 1957 1474 2069">Interview with PREA Coordinator indicates that material that are typically redacted from annual report is personal identifying information. The nature of the material redacted is indicated in the report.</p>

**CONCLUSION:**

Based upon the final analysis of evidence, the auditor finds the facility is fully compliant with Standard 115.88.

<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>115.89(a): Policy 606 PREA mandates that 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 (28 CFR 115.71 ).</p> <p>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 (28 CFR 115.89).</p> <p>During the physical plant review, auditor observed the physical storage area of screening and risk assessment documentation which is maintained in Classification and on ATIMS electronic database. Classification maintains access through this password protected system on computer and Classification offices are maintained in the basement in a secure location. Medical and mental health records are maintained in the Medical floor (2nd floor) in a locked and secure office. Custody staff secures access to the medical floor, access to the offices are secured electronically.</p> <p>Interview with PREA Coordinator indicates that the agency reviews data collected and aggregated pursuant to standard 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies in training. The agency ensures the data collected pursuant to standard 115.87 is securely retained. The agency takes corrective action on an ongoing basis based upon data such as trends and patterns that can be corrected.</p> <p>115.89(b): Policy 606 PREA mandates that all aggregated sexual abuse data from Solano County Sheriff's Office Detention Facilities and private facilities with which it contracts shall be made readily 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 (28 CFR 115.89).</p> <p>115.89(c): Policy 606 PREA mandates that all aggregated sexual abuse data from Solano County Sheriff's Office Detention Facilities and private facilities with which it contracts shall be made readily 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 (28 CFR 115.89).</p> <p>115.89(d): Policy 606 PREA mandates that 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 (28 CFR 115.71 ).</p> <p>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 (28 CFR 115.89).</p> <p><b>CONCLUSION:</b> Based upon the final analysis of evidence, the auditor finds the facility is fully</p>

	compliant with Standard 115.89.
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>115.401(a): Agency has been audited beginning in 2018 and has all three facilities audited at least once, in each PREA audit cycle, since that period.</p> <p>115.401(b): Agency has been audited beginning in 2018 and has all three facilities audited at least once, in each PREA audit cycle, since that period.</p> <p>115.401(h): The auditor was provided access to and observed all areas of the audited facilities to include housing units, mezzanines, closed and locked areas, areas where inmates and staff have access to, areas where only non-custody staff have access.</p> <p>115.401(i): The agency/facility has provided auditor with copies of any requested documents and information, including electronically stored information upon request.</p> <p>115.401(m): Auditor was permitted to conduct private interviews with inmates in multi-purpose rooms, secure gym and interview rooms.</p> <p>115.401(n): Inmates were permitted to send confidential information to correspondence to the auditor in the same manner as if they were communicating with legal counsel. The nature of correspondence by inmates to the auditor was discussed and approved by the agency during the pre-audit phase prior to posting of the Notice of Auditor posters throughout the facility. Review of the notice of auditor posted throughout the facility was accurate and posted in abundance throughout the facility. During interviews, inmates indicated that they viewed the notice of auditor posters being placed and replaced by staff months prior to the auditor's presence during the onsite audit. Auditor recieved written communication from two inmates. Neither was available to interview during the onsite audit.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.403(f): 2021 Final PREA Audit Report is published on the agency website to include Final PREA Audit Report for years 2017, 2018, 2019 and 2020

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

<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

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

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

<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	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
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	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
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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

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

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

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

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

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

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

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

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

<b>115.34 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.35 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.64 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.64 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.65 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

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

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

<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na

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

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

<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes

<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.83 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

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

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

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

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

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

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	no
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes

<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	<p>The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)</p>	yes