

PREA Facility Audit Report: Final

Name of Facility: Hernando County Detention Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/28/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: James Kenney	Date of Signature: 06/28/2024

AUDITOR INFORMATION	
Auditor name:	Kenney, James
Email:	kenney.consult@gmail.com
Start Date of On-Site Audit:	06/16/2024
End Date of On-Site Audit:	06/18/2024

FACILITY INFORMATION	
Facility name:	Hernando County Detention Center
Facility physical address:	16425 Spring Hill Drive, Brooksville , Florida - 34604
Facility mailing address:	

Primary Contact

Name:	
Email Address:	
Telephone Number:	

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Al Nienhuis
Email Address:	anienhuis@hernandosheriff.org
Telephone Number:	3527546830

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Health Service Administrator On-site	
Name:	Kristine DeKany
Email Address:	kdekany@hernandosheriff.org
Telephone Number:	352-544-2334

Facility Characteristics	
Designed facility capacity:	812
Current population of facility:	663
Average daily population for the past 12 months:	633
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males

Age range of population:	16-89
Facility security levels/inmate custody levels:	Minimum/Medium/Maximum
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	183
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	2
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	87

AGENCY INFORMATION

Name of agency:	Hernando County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	18900 Cortez Boulevard , Brooksville, Florida - 34601
Mailing Address:	
Telephone number:	352-544-2334

Agency Chief Executive Officer Information:

Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information

Name:	Elizabeth Odonnell	Email Address:	eodonnell@hernandosheriff.org
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

2

- 115.32 - Volunteer and contractor training
- 115.67 - Agency protection against retaliation

Number of standards met:

43

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-06-16
2. End date of the onsite portion of the audit:	2024-06-18

Outreach

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

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	812
15. Average daily population for the past 12 months:	631
16. Number of inmate/resident/detainee housing units:	16
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	639
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	1
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:	5
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:	20
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:	4
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:	3
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:	34

<p>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:</p>	<p>13</p>
<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>4</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>61</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>183</p>

<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>87</p>
<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>1</p>
<p>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:</p>	<p>No text provided.</p>

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>18</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>

55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The auditor selected the 15th person down the page, the 20th person down the page, and the fifth person on the second page, from each housing unit to interview, ensuring to capture individuals from different ages and races.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	18
<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>	
59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	1

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:	2
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	2
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
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:	2
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:	4

<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor reviewed records provided by the PREA Coordinator and classification to determine there were no individuals in the facility who identified as transgender on the intake screening.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>3</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>2</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor reviewed the housing roster for the segregation housing unit and confirmed through interviews with the Deputy in the segregation unit, the classification supervisor, and the PREA Coordinator, there were no individuals held in segregation due to the high risk for victimization.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>23</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Mail room, Grievance coordinator, Maintenance, Food services.
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	1
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

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

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

Yes

No

<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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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>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	5	0	3	2
Staff-on-inmate sexual abuse	3	0	3	0
Total	8	0	6	2

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	8	0	8	0
Staff-on-inmate sexual harassment	5	0	5	0
Total	13	0	13	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	3	1	1
Staff-on-inmate sexual abuse	0	3	0	0
Total	0	6	1	1

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	3	0	0
Staff-on-inmate sexual harassment	0	5	0	0
Total	0	8	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

13

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>5</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>8</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>8</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	5
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<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)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff

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

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

The audited facility or its parent agency

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

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

Other

Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. <i>Hernando County Detention Center Organizational Chart</i> 2. Interviews: <ol style="list-style-type: none"> 1. PREA coordinator <p>Findings (by provision):</p> <p>115.11(a). The Hernando County Detention Center (HCDC) has adopted a comprehensive written policy that mandates zero-tolerance toward all types of sexual abuse and sexual harassment. The Detention Center provided their <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>, which contains their entire sexual abuse policy and information related to the PREA standards. The policy states,</p>

“The purpose of this policy is to establish procedures in accordance with the Prison Rape Elimination Act (PREA) standards for the detection, prevention, elimination, reduction, response and prosecution of perpetrators of sexual abuse/harassment of inmates; to address the safety and treatment needs of any inmates who have been a victim of a sexual act; and to discipline and prosecute those who perpetrate these acts upon inmates.” The policy goes on to state, “The Hernando County Sheriff’s Office Detention Center has established standards defined by the Prison Rape Elimination Act of 2003. These standards are established for the reduction and punishment of sexual abuse of inmates; to address the safety and treatment needs of inmates who have been a victim of a sexual act; and to discipline and prosecute those who perpetrate these acts upon inmates. The Hernando County Detention Center mandates zero tolerance towards all forms of sexual abuse and sexual harassment in the facility. Sexual conduct between staff and inmates; among inmates; or between volunteers, contracted personnel, official visitors, and inmates regardless of consensual status, is prohibited and subject to administrative and/or criminal disciplinary sanctions. The Hernando County Detention Center shall make every effort to provide all staff, volunteers, contractors, official visitors, and inmates a safe and secure environment, free from the threat of sexual abuse/harassment.” The policy provides the definitions for sexual abuse and sexual harassment that are consistent with the prohibited behaviors in the PREA standards. The policy also outlines sanctions for those that have participated in prohibited behaviors in the facility. Based upon this analysis, the auditor finds the facility in compliance with this provision.

115.11(b). The agency has designated an agency wide PREA coordinator, Administrative Sergeant Brad Collito, who maintains these duties along with his duties as the jail’s administrative sergeant. The facility’s organizational chart was provided for review. The chart shows the PREA coordinator’s position in the chain of command under the administrative lieutenant, three steps from the jail administrator. However, the chart also shows the PREA coordinator as a direct report to the Major, the Jail Administrator. Throughout the audit process, the auditor was able to observe the PREA coordinator’s direct access to the Major, both in person and by telephone and email. There is no question as to the authority level of the PREA coordinator at this agency. The auditor interviewed the PREA coordinator and confirmed that he has other responsibilities but has ample time to oversee the agency’s efforts to comply with the PREA standards. He also confirmed that he has direct access to the Major so immediate action, if necessary, can be taken. Based on this interview and my contact with the agency during the several months of this audit, the auditor believes he has both the time and authority necessary. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.11(c). The Hernando County Sheriff’s Officer operates only one facility, the Hernando County Detention Center. Under this provision, there is no requirement to appoint a PREA compliance manager and the agency does not. Therefore, this provision is not applicable. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.12	Contracting with other entities for the confinement of inmates
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1267 412">The following evidence was analyzed in making the compliance determination:</p> <ol data-bbox="320 490 1214 647" style="list-style-type: none"> <li data-bbox="320 490 1214 524">1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol data-bbox="424 528 568 562" style="list-style-type: none"> <li data-bbox="424 528 568 562">1. None <li data-bbox="320 568 541 602">2. Interviews: <ol data-bbox="424 607 927 640" style="list-style-type: none"> <li data-bbox="424 607 927 640">1. Agency Contract Administrator <p data-bbox="256 685 639 719">Findings (by provision):</p> <p data-bbox="256 759 1482 837">115.12(a). The agency stated in the PAQ they do not contract with any other agency for the housing of their incarcerated individuals.</p> <p data-bbox="256 871 1453 1039">The auditor interviewed the administrative lieutenant during the onsite phase of the audit. He confirmed that HCDC does not house their incarcerated individuals in any other detention facility under any contract. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p data-bbox="256 1072 1477 1397">115.12(b). The agency does not contract with any other agency for the housing of their incarcerated individuals. The auditor interviewed the administrative lieutenant during the onsite phase of the audit. He stated that he would be responsible for such a contract if one did exist or if the agency had the need to engage in that contract. He confirmed that they would only house incarcerated individuals in a facility that can show proof of PREA compliance. He also confirmed that they would include in the contract provisions to audit for PREA compliance. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.13	Supervision and monitoring
	<p data-bbox="256 1601 959 1635">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 1680 544 1713">Auditor Discussion</p> <p data-bbox="256 1758 1267 1825">The following evidence was analyzed in making the compliance determination:</p> <ol data-bbox="320 1904 1430 2060" style="list-style-type: none"> <li data-bbox="320 1904 1430 1937">1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol data-bbox="424 1942 1430 2060" style="list-style-type: none"> <li data-bbox="424 1942 1430 1975">1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> <li data-bbox="424 1980 1430 2013">2. <i>Hernando County Detention Center Staffing Plan 2024</i> <li data-bbox="424 2018 1430 2060">3. Activity Logs (unannounced rounds)

2. Interviews:
 1. PREA Coordinator
 2. Agency Head
 3. Random Incarcerated individuals
 4. Random Staff
 5. Specialized Staff
3. Site Review Observations:
 1. Control rooms (electronic monitoring)
 2. Programs area
 3. Housing units
 4. Kitchen
 5. Health services

Findings (by provision):

115.13(a). The agency provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The Hernando County Detention Center shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring and shall take into consideration.” The policy goes on to list the eleven (11) required staffing plan elements from this provision of the standard. The auditor was also provided a copy of the *Hernando County Detention Center Staffing Plan 2024*. The document is well written and provides a strong description of the staffing in the facility. The plan includes a review of the programs, activities, and transportation requirements for incarcerated individuals, video monitoring, and the coverage plan for staff. The plan was written within the last year.

The staffing plan mandated in this provision must account for these eleven (11) considerations:

1. Provision 115.13(a)(1) – Generally accepted detention and correctional practices – The HCDC references utilization of staff consistent with the Florida Model Jail Standards (FMJS), and the Florida Corrections Accreditation Commission, which allow for adequate staffing to ensure effective supervision of incarcerated individuals. This also ensures that deputies are posted within sight or hearing distance of incarcerated individuals in order to respond promptly to calls for help.
2. Provision 115.13(a)(2) – Any judicial findings of inadequacy – The HCDC states that there are no such findings of inadequacy.
3. Provision 115.13(a)(3) – Any findings of inadequacy from Federal investigative agencies – The HCDC states that there are no such findings of inadequacy.
4. Provision 115.13(a)(4) – Any findings of inadequacy from internal or external oversight bodies – The HCDC has not had any internal or external findings of

inadequacy by any oversight bodies.

5. Provision 115.13(a)(5) – All components of the facility’s physical plant (including “blind-spots” or areas where staff or incarcerated individuals may be isolated) – The HCDC consists of single cell, multi-cell, and open dormitory housing to accommodate all levels of incarcerated individual classifications. The close proximity of staff during daily activities and the interaction with staff in multiple areas provide little to no opportunity for staff and incarcerated individuals to be isolated within the facility. This is coupled with the use of video monitoring and mirrors, which work well to eliminate potential blind spots in areas where such isolation could occur.

6. Provision 115.13(a)(6) – The composition of the inmate population – The HCDC houses male and female, adjudicated juvenile and adult incarcerated individuals regardless of race, ethnic origin, sexual orientation, gender identity, and intellectual or physical disability. The facility houses all incarcerated individuals for Hernando County and maintains contracts for housing Pasco County and US Marshal inmates. Vulnerable populations within the facility, which include lesbian, gay, bisexual and transgender incarcerated individuals, and incarcerated individuals with mental illness or other disabilities, may be at high risk for victimization. Staffing is maintained at a level to provide safety and security for all incarcerated individuals.

7. Provision 115.13(a)(7) – The number and placement of supervisory staff – At least one upper-level supervisor will be on duty at all times. This, coupled with supervisory staff for each shift, provides adequate coverage to monitor the placement of staff supervising and monitoring the incarcerated individual population.

8. Provision 115.13(a)(8) – Institution programs occurring on a particular shift – Adequate support staff is provided to ensure that programs continue at all times of the day without the interruption to the orderly operation of the facility and without limiting safety and security for the incarcerated individuals. Religious services, visitation, and educational programs are all conducted seven (7) days a week.

9. Provision 115.13(a)(9) – Any applicable State or local laws, regulations, or standards – The Florida Model Jail Standards are minimum standards which jails across Florida must meet to ensure the constitutional rights of those incarcerated are upheld. These standards include provisions for the safety of all incarcerated individuals. The HCDC meets each of these standards and is subject to annual and unannounced inspections to ensure compliance. There are no other laws or regulations currently in place.

10. Provision 115.13(a)(10) – The prevalence of substantiated and unsubstantiated incidents of sexual abuse – Over the previous two years, the facility has had one substantiated incident of sexual abuse. This incident has not provided the facility with a pattern or specific area of concern, which required action to be taken. Likewise, the type of unsubstantiated incidents of sexual abuse have not provided the facility any opportunity to make changes to policy, procedure, housing, staffing or video monitoring in the facility.

11. Provision 115.13(a)(11) – Any other relevant factors – There are no other

relevant factors at the HCDC that affect its ability to detect, prevent, and respond to issues of sexual abuse, sexual assault or sexual harassment of incarcerated individuals in its care and custody.

The overall staffing of the facility is consistent with accepted practices and standards and the auditor saw nothing in the plan or in the facility that would be inconsistent with that finding.

During the site review, the auditor found no areas of concern that would be considered blind spots in the facility. The auditor reviewed all areas, including the kitchen, laundry, medical, and all housing units. There are clearly visible cameras throughout the facility and the auditor could see where the facility had identified potential areas of concern, as some mirrors had been installed. This would support the assertion in the staffing plan that the facility has done an extensive review. The auditor visited the control rooms where staff actively monitor video within the facility. There appeared to be extensive coverage in all areas of the facility.

The auditor talked with supervisors throughout the facility and witnessed their interactions with staff. It was apparent that there is ample supervisory coverage to ensure staff and incarcerated individual safety.

The auditor interviewed the Major, who is the agency head, who confirmed the written staffing plan. The plan includes a review to ensure adequate staffing to meet the agency's efforts to prevent, detect and respond to incidents of sexual abuse. The video monitoring system is evaluated at least once per year to determine if the agency should adjust it due to safety concerns. The Major stated that they utilize an overtime list to ensure proper coverage on each shift to avoid deviations which could lead to unsafe conditions in the facility. The Major reviews daily and weekly staffing reports and addresses any concerns immediately. The auditor also interviewed the PREA coordinator, who confirmed that he plays a large role in the development of the staffing plan. He explained the need to review each of the points in this standard in developing the plan. Each of the points assists the agency to better prevent and detect sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.13(b). In the PAQ, the auditor was provided with *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan. Documentation of deviations will be conducted via memorandum by the shift command and submitted through the chain-of-command to the Jail Administrator and a courtesy copy sent to the PREA Coordinator." In the PAQ, the agency reported no such deviations from the staffing plan during the 12 months prior to the onsite audit.

During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator. The Major stated that they utilize an overtime list to ensure proper coverage on each shift to avoid deviations which could lead to unsafe conditions in the facility. The Major reviews daily and weekly staffing reports and addresses any concerns immediately. The Major was unaware of a time when activities of

incarcerated individuals had to be limited due to short staffing. Shift supervisors utilize the overtime list to fill open positions on the shift due to sick leave and vacation leave or leaves of absence. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.13(c). In the PAQ, the auditor was provided with *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Whenever necessary, but no less frequently than once each year the Jail Administrator in collaboration with the PREA Coordinator will assess, determine, and document whether adjustments are needed to the following: The staffing plan established pursuant to paragraph (1) of this section; The facility's deployment of video monitoring systems and other monitoring technologies; The resources the facility has available to commit to ensure adherence to the staffing plan." The staffing plan includes this statement, "In consultation with the PREA Coordinator, Jail Administrator, Judicial Services Captain, Operations Lieutenant, Administrative Lieutenant, and the Detention Inspector, a review of the existing staffing plan to assess, determine, and document whether adjustments were needed took place on May 7, 2024. During the meeting, an analysis of the facility's deployment of video monitoring systems and other monitoring technology was found to be sufficient; no additional changes are needed. The resources the facility has available are sufficient to ensure adherence to the staffing plan."

The PREA coordinator was interviewed, and he stated that the annual review is completed annually and is performed by the PREA coordinator in conjunction with the facility administration. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.13(d). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "The Hernando County Detention Center shall have first line supervisors and higher level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. These practices are implemented for night shifts as well as day shifts. Staff shall be prohibited from alerting other staff members that unannounced supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility. Unannounced rounds shall be documented in Guardian RFID."

During interviews with 18 random incarcerated individuals, each incarcerated individual clearly stated they see supervisors come in the housing units often. During interviews with 12 random staff members, staff stated that supervisors perform rounds daily and at different times. Supervisors interviewed indicated that rounds are performed at all times of the day and night. Also, during the site review, the auditor met supervisors in the housing units while they were performing their unannounced rounds.

Several copies of activity logs were supplied in the PAQ, which showed various upper-level supervisors logging in PREA rounds throughout the facility. Rounds are logged as Unannounced Rounds as the supervisor accesses each area and logs that on the Guardian RFID system. The auditor interviewed two mid-level supervisors during the

	<p>onsite audit. Both stressed that rounds are performed in all areas of the facility and are performed at all times of the day and night. Both supervisors stated they begin their rounds at different times and in different areas of the facility to ensure they remain unannounced. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) 2. Population reports 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals 3. Random incarcerated individuals 3. Site Review Observations: <ol style="list-style-type: none"> 1. Programs area 2. Youthful housing <p>Findings (by provision):</p> <p>115.14(a). The auditor reviewed <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>, which was provided in the PAQ. This policy clearly outlines the requirements to house incarcerated individuals in the facility that are under the age of 18. The policy states, “juvenile inmates shall not be placed in housing units where the juvenile inmate will have sight, sound or physical contact with any adult inmates through the use of a shared dayroom or other common space, shower area or sleeping quarters.” The auditor was provided with facility population reports for the 12 months preceding the onsite phase of the audit. These reports show a total of ten (10) youthful individuals housed in the facility during the 12-month period. The population reports show nearly all of these individuals are housed for less than five (5) days.</p> <p>During the site review, the auditor toured the facility and noted one youthful, incarcerated individual currently housed in the facility. The individual was housed in a private cell in the medical building, separate from all adult incarcerated individuals. The cell is directly across from the deputy station in the medical unit, which provides direct supervision and additional protection from the adult incarcerated individuals that may also be housed in the medical unit. The cell is quite large, with extra space</p>

for movement in the cell away from the bunk. The cell has its own sink, toilet, and shower, which allows the incarcerated individual to perform bodily functions and shower without viewing by any other incarcerated individual. The auditor interviewed the youthful individual, who stated he had been in the facility for a little over two (2) months. He stated he was never in view of the adult incarcerated individuals and had enough separation from sound. The auditor also interviewed the deputy assigned in the unit assigned to monitor youthful individuals. The deputy was clear that separation from adult incarcerated individuals is always maintained. She stated that her post right next to the separate cell helps to ensure the separation by sight and sound. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.14(b). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "In areas outside of the housing unit sight, sound and physical contact separation between juvenile and adult inmates will be maintained or, in cases where separation is not possible, direct staff supervision will be provided."

The auditor interviewed one youthful individual during the onsite phase of the audit. The individual told the auditor that he was able to go to outside recreation every day, although some days he chooses to say no. He said he could go to recreation and return from recreation without being viewed by adult individuals. He told the auditor that staff always empty the hallway before he is moved. The auditor interviewed the deputy assigned in the medical unit. She told the auditor that anytime the youthful, incarcerated individual is moved outside the medical unit, an announcement is made to ensure there are no adults present. The youthful individual is always directly escorted at all times throughout the institution. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.14(c). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "The Detention Center shall make its best effort to avoid placing juvenile inmates in isolation to comply with this PREA standard. Juvenile inmates shall not be denied daily large muscle exercise and any legally required special education services. Juvenile inmates shall have access to other programs and work opportunities to the extent possible."

During the onsite audit, the auditor viewed the youthful, incarcerated individual, who was housed in a private cell in the medical building. The PREA coordinator told the auditor that this private housing is the only acceptable housing for a youthful individual to meet the requirements for sight and sound separation. The auditor believes this to be "best efforts" based on the availability of cell space, physical plant of the facility, and due to the housing of only one individual. The auditor interviewed one youthful individual during the onsite phase of the audit. The individual told the auditor that he was able to go to outside recreation every day, although some days he chooses to say no. He said he could go to recreation and return from recreation without being viewed by adult individuals. He told the auditor that staff always empty the hallway before he is moved. He also stated that he is prepared to return to his school studies as soon as school is back in session following the summer break. The auditor interviewed a program manager, who is responsible for coordinating

	<p>programming activities for the incarcerated individual population. This includes educational opportunities. He told the auditor that education for the youthful individual would be provided by the County School Board when school begins for the fall session. The teacher will come to the facility and provide face-to-face education in a separate classroom in the program hallway. The last classroom in the hall provides complete separation from all adult incarcerated individuals and allows the youthful individual to receive all required school education. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Lesson plan - <i>Cross-Gender and Transgender Pat Searches</i> 3. Training records 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals 3. Random incarcerated individuals 3. Site Review Observations: <ol style="list-style-type: none"> 1. Control rooms (electronic monitoring) 2. Strip search room 3. Bathrooms and shower areas 4. Housing units 5. Medical services <p>Findings (by provision):</p> <p>115.15(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. This document specifically describes the policy related to when and how searches are to be performed on incarcerated individuals. The policy prohibits cross-gender strip searches and states, "Except in the case of an emergency or other exigent circumstances, the Hernando County Detention Center prohibits cross-gender strip searches. The Hernando County Detention Center restricts cross-gender pat searches. A male deputy may not conduct a pat-down search on a female inmate unless the inmate presents an immediate risk of harm to herself or others and a female deputy is not available to do the search. Any cross-gender strip searches or cross-gender pat searches will be documented in an incident</p>

report in JMS. Only a physician can conduct body cavity searches (refer to *Detention Division Directive 7050.11 - Body Cavity, Strip Searches and Visual Inspections*).” The PAQ shows that cross-gender strip searches or cross-gender body cavity searches were performed in the previous 12 months.

During the site review, the auditor viewed the strip search room in the facility’s intake area. This room has no window on the door and no camera inside. It is utilized as the dress out room for all new intake incarcerated individuals and for strip searches of those individuals that are required to receive on based on their arrestable charges and the Florida State Statutes. Through informal discussion with deputies in the intake area, the auditor learned that all strip searches had to be performed by a staff member of the same gender as the incarcerated individual. Informal discussion with incarcerated individuals confirmed that information, with all incarcerated individuals stating that they were never searched by a staff member of the opposite gender. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.15(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This document specifically describes the policy related to when and how searches are to be performed on incarcerated individuals. The policy prohibits cross-gender pat down searches and states, “Except in the case of an emergency or other exigent circumstances, the Hernando County Detention Center prohibits cross-gender strip searches. The Hernando County Detention Center restricts cross-gender pat searches. A male deputy may not conduct a pat-down search on a female inmate unless the inmate presents an immediate risk of harm to herself or others and a female deputy is not available to do the search. Any cross-gender strip searches or cross-gender pat searches will be documented in an incident report in JMS.” The PAQ shows that no cross-gender pat down searches have been performed in the previous 12 months.

During informal discussions with staff and random interviews with staff and incarcerated individuals, everyone confirmed that pat searches of female incarcerated individuals are performed by female staff members. The auditor interviewed 18 random incarcerated individuals, seven (7) of which were female, as well as three (3) additional female individuals in the targeted interviews. Each stated clearly that they were never searched by a male staff member or witnessed a male staff member searching a female incarcerated individual. All ten (10) female incarcerated individuals stated that male officers were not allowed to search them. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.15(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “Any cross-gender strip searches or cross-gender pat searches will be documented in an incident report in JMS.” In the PAQ, the facility stated there were no cross-gender searches over the previous 12-month period. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.15(d). The auditor was provided with *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The Hernando County

Detention Center restricts cross-gender viewing of inmates showering, performing bodily functions, and changing clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine checks. In the event of an emergency or exigent circumstance of cross-gender viewing, the incident will be documented in an incident report in JMS.” The policy also states, “When staff of the opposite gender enters into a housing pod or cell they shall announce their presence, when entering, to the inmates in that housing area.”

During the site review, the auditor visited all housing units and viewed the restroom and shower areas. In all areas, the auditor could see the specific actions taken to provide privacy. The facility has a total of sixteen (16) housing units in three (3) pods. A Pod has eight (8) housing units. Six (6) of the units hold four-man cells and the other two (2) units hold ten-man cells. The units are two-tiered, and the cells are behind bars, which provide easy viewing of the incarcerated individuals during visual rounds in the units and by the operator in the control room. This is to ensure the safety and security of the incarcerated individuals. Toilets and sinks are inside each cell, but the toilets are behind a pony wall, which provides adequate modesty from the deputies as they perform visual rounds or other functions inside the housing unit. Showers are available on both levels and each shower has its own shower curtain for privacy from staff and other individuals.

B Pod has six (6) housing units. All six units are essentially the same layout. The units are two-tiered and have 20 double-bunked cells behind a closed door. The door has a window for viewing during visual rounds. The cells have their own toilet and sink, and showers are available on the lower level. Each shower has its own shower curtain for privacy from staff and other individuals. One unit in B Pod is utilized as the segregation unit and two of the units are for female housing, on the opposite side of the control room in the center of the pod.

C Pod holds two (2) open dormitory style housing units. Each unit holds 50 double-bunk beds in the open dormitory with open restrooms and showers to the side of the unit. In the restrooms, toilets are available with large dividers between each toilet. The showers are along one wall. The group restroom area is all behind a raised wall which provides privacy and modesty for the showers and toilets. The auditor walked through each unit and was unable to view any incarcerated individual in the toilet area or see the body of any individual in the shower because of the height of the wall. The auditor reviewed camera views from the control room and confirmed there was no viewing of individuals in the showers or on the toilets.

The auditor visited two control rooms where video is monitored by staff. The auditor was able to view housing units and determined that there were no cameras that could view into the restrooms or showers in any of the housing units throughout the facility. In each housing unit the auditor noted required zero tolerance signage and the required auditor notice posted. The auditor tested the telephones in several units to verify the telephones were operational. The signage noted the PREA hotline number, and they were posted in a place that was adequate to enable individuals to call the number if it was necessary to do so. The auditor also noted PREA education available

on the kiosks inside the housing units.

Also, during the site review, the auditor routinely witnessed cross-gender announcements during entry into housing units. The auditor was escorted by a female deputy during the facility site review, including the male housing units. Each time the auditor approached the unit door, the officer on duty or the escorting staff clearly made a "female on the floor" announcement when entering male housing units or "male on the floor" when entering female housing units and asked that we wait a few minutes before we could enter. This allowed incarcerated individuals the opportunity to cover up if it was necessary.

During random interviews with 18 incarcerated individuals, they all stated that officers routinely make an announcement before entry to the unit. Incarcerated individuals also confirmed that they felt comfortable to shower and use the restroom without staff members of the opposite sex viewing them. During random interviews with 12 staff members, they confirmed that cross-gender announcements are done every time someone enters a housing unit. Officers stated clearly that they cannot see incarcerated individuals in the showers and restrooms and will only see incarcerated individuals naked during routine cell checks and security rounds. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.15(e). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Deputies will not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate or 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."

During interviews with 12 random staff members, the auditor asked about the strip search policy and the identification of transgender incarcerated individuals. All 12 staff members were aware of the policy regarding strip searches and identification of transgender incarcerated individuals. All staff interviewed stated that only medical staff can visualize the incarcerated individual's body, if necessary, to determine an individual's genitalia. The auditor interviewed one (1) transgender female individual during the onsite audit. The individual confirmed that she had not been strip searched by anyone just to determine her genitalia. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.15(f). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Deputies will receive training on how to conduct cross-gender, transgender and intersex pat down searches, in a professional and respectful manner, and the least intrusive manner possible, consistent with security needs." The facility provided the auditor with the lesson plan for the *Cross-Gender and Transgender Pat Searches* training curriculum. The auditor viewed the education during the onsite audit and noted the curriculum was more than adequate to educate staff on the proper steps to perform such searches of the incarcerated individual population. The auditor was also provided training rosters to

	<p>show attendance and completion of the class by the facility staff.</p> <p>During random staff interviews, all 12 staff members stated that they had received training on performing pat searches of transgender incarcerated individuals. All those interviewed stated that searches must be done professionally and respectfully. Officers stated that a transgender individual would be given a search preference form and would select either a male or female to perform the strip search. The auditor was told that they rarely have transgender incarcerated individuals incarcerated in the jail. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. <i>Contract and Statement of Work - Language Line Services, Inc.</i> 3. <i>PREA Pamphlet - End the Silence</i> 2. Interviews: <ol style="list-style-type: none"> 1. Agency head 2. Targeted incarcerated individuals 3. Random incarcerated individuals 3. Site Review Observations: <ol style="list-style-type: none"> 1. Postings in housing units 2. Medical housing 3. Incarcerated individual educational materials in intake <p>Findings (by provision):</p> <p>115.16(a). In the PAQ, the auditor was provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, "The Hernando County Detention Center shall take appropriate steps to ensure that inmates with disabilities or inmates who are Limited English Proficient (LEP) 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 in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Provisions will be accommodated by the PREA Coordinator and documented in the inmate's custody record. The following will be available but not limited to: Interpreter services for the deaf or hard of hearing inmates; Interpreter services for Non-English speaking inmates; and Reading of the</p>

material, by staff, to inmates.” The agency provided the auditor with a contract and statement of work with Language Line Services, Inc. for translation services. The auditor was also provided copies of the intake PREA education, *End the Silence*, and questionnaires in several languages.

During the site review, the auditor talked with one incarcerated individual who spoke Spanish. The incarcerated individual understood what PREA was and knew how to properly report an incident of sexual abuse, if needed. There were signs clearly posted in each of the housing units in English and Spanish. The auditor viewed the incarcerated individual orientation information on the kiosk in two languages, and it was easy to read and included captions.

The auditor interviewed six (6) targeted incarcerated individuals, two (2) with a physical disability, two with a cognitive disability, one (1) with partial blindness, and one who is partially deaf. All six incarcerated individuals could explain what PREA was, the prohibited behaviors and how to properly report an incident of sexual abuse or sexual harassment. The first with a physical disability is elderly and is permanently in a wheelchair. He stated that he easily gets around the facility and had no problem with accessing intake education. He understands the PREA information and was able to easily use the telephone and kiosk. The second individual with a physical disability is also in a wheelchair and has a colostomy. He also stated he had no problem accessing PREA education or the kiosk in the medical unit. Both individuals with a cognitive disability reported that they felt very safe in the jail. They are both housed in general population and know how to access the kiosk and the tablet. They both told the auditor they could talk to a staff member if they had any issues with another incarcerated individual or a staff member regarding sexual abuse or sexual harassment. The auditor interviewed the individual with partial blindness and was told that he could see and hear the educational video that runs on the television in the housing unit. It was easy for him to see even with his limited vision. He understood the zero tolerance policy and knew how to report sexual abuse or sexual harassment. The individual who is partially deaf also told the auditor he was able to see the video and explained that it has closed captions to make it easier if sound in the housing unit is loud and he cannot hear it. He was provided written materials that explained the jail’s sexual abuse information and told him how to report sexual abuse. The Major, the jail administrator, confirmed that all efforts are made to provide all incarcerated individuals with the required PREA information, regardless of what limitations they may have. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.16(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “The Hernando County Detention Center shall take appropriate steps to ensure that inmates with disabilities or inmates who are Limited English Proficient (LEP) 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 in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Provisions will be accommodated by the PREA Coordinator and documented in the inmate’s custody record. The following will be available but not limited to: Interpreter services for the deaf or hard of hearing

inmates; Interpreter services for Non-English speaking inmates; and Reading of the material, by staff, to inmates.” The HCDC provides incarcerated individuals with a handbook is provided in both English and Spanish on the kiosk and the tablet and the initial education *PREA Pamphlet, End the Silence*, is also available in both languages.

The auditor spoke with one incarcerated individual who spoke Spanish during the random incarcerated individual interviews. The incarcerated individual could speak both English and Spanish. The auditor was able to speak with him in English, but he confirmed that all information for orientation and PREA are readily available in Spanish and are easily understood. The auditor interviewed two (2) individuals who spoke Spanish during the onsite phase of the audit. Both were able to communicate with the auditor with the assistance of a staff member who translated Spanish. Both individuals were aware of the zero tolerance policy, knew how to report sexual abuse or sexual harassment, and explained that signs in the housing units were in Spanish, making it easy for them to read and understand. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.16(c). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “At no time will inmate interpreters be used by any staff member to interpret or translate the report of sexual abuse, except in 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.”

During the onsite phase of the audit, the auditor spoke with 12 random staff members and 18 random incarcerated individuals. All staff and incarcerated individuals stated that the facility does not utilize incarcerated individuals to interpret for other incarcerated individuals. Staff members stated clearly that using an incarcerated individual to interpret could be dangerous, as there is no way to ensure that the translation from their language to English is accurate.

The Major, the jail administrator, and the PREA coordinator both confirmed that use of incarcerated individual interpreters is prohibited in the policy and not authorized.

Rather than use an incarcerated individual, they would utilize the LanguageLine or provide a pre-printed copy of the zero tolerance policy in any language necessary to meet the incarcerated individual’s needs. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *Hernando County Sheriff's Office Supplemental Questionnaire*
 3. *Sheriff's Office Law Enforcement Employment Application Form*
 4. Employment records
2. Interviews:
 1. Specialized staff

Findings (by provision):

115.17(a). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center shall not hire or promote anyone who may have contact with inmates and shall not enlist the services of any contractor who may have contact with inmates who: 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); 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; Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph 1, b, of this section." The auditor was provided with the *Hernando County Sheriff's Office Supplemental Questionnaire*. This document asks the questions in this provision and is given to all new applicants for employment, to those seeking promotions, to contractors, and to volunteers.

The agency's employment application (*Sheriff's Office Law Enforcement Employment Application Form*) requires that the applicant answer affirmatively regarding any prior arrests for all felony charges, specifically sexual abuse related offenses. The criminal background check will verify that this information is correct. The applicant then must take a computer voice stress analysis (CVSA) test prior to final selection for employment. This test also includes questions regarding sexual abuse related offenses and sexual harassment accusations.

All potential volunteers and contractors that will have incarcerated individual contact inside the secure facility must also have a completed background check performed prior to admission to the facility. This requires that the applicant affirmatively state that they have not been charged with a sexual abuse offense or be the subject of a sexual harassment allegation.

The auditor was provided with the human resources files for ten (10) corrections deputies that were hired during the 12 months prior to the onsite audit. The files included proof of the complete background check, the completed application where the staff member answered the required questions, and the signed approval for hire based on the background check. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County

Detention Center shall consider any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor who may have contact with inmates.”

The employment application for staff members and for volunteers and contractors includes a questionnaire that specifically asks applicants if he or she was the subject of a sexual harassment allegation. During the onsite phase of the audit, the auditor interviewed a specialist from human resources. The specialist confirmed that sexual harassment allegations are taken into consideration during the approval and hiring process for all individuals. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(c). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “Before hiring new employees who may have contact with inmates, the Hernando County Sheriff’s Office Human Resources Section shall: Perform a criminal background records check; 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.” In the PAQ, the agency stated there were a total of 37 individuals hired who have contact with incarcerated individuals, all of whom have had the background check completed.

During the onsite phase of the audit, the auditor interviewed a specialist from human resources. The specialist confirmed the agency will not hire an individual who has a negative employment history check. This includes asking prior corrections employers if the individual had a substantiated sexual abuse allegation or resigned during an investigation of sexual abuse. The agency was not able to provide proof of denying employment based on this evaluation because it has not yet happened over the last five years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(d). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “Before enlisting the services of any contractor who may have contact with inmates, the Detention Center will perform a criminal background records check.”

During the onsite phase of the audit, the auditor interviewed a specialist from human resources. The specialist stated once the background is completed, the application must be approved by the administration before the individual’s name is entered on the approved contractor list. At the time of the audit, the agency had only one (1) approved contractor, the doctor, who has been with HCDC for seventeen years. The background check process is also completed for anyone who will volunteer with incarcerated individual programs or the chaplain’s office and for any contractor. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(e). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “The Hernando County Detention Center has in place a system for capturing details on any arrests by utilizing the automatic response system in FCIC/NCIC. All information for current

employees and volunteers shall immediately be forwarded via a FDLE hit to the Human Resources Section within the Sheriff's Office. This process is automatic due to all fingerprints being electronic."

During the onsite phase of the audit, the auditor interviewed a human resources specialist, who confirmed it is part of their normal procedure to fingerprint all new staff members into the state's live tracking system, called Falcon. This will enable the agency to receive an instant notification if any staff member is fingerprinted anywhere within the United States. All volunteers and contractors have a background check completed every year. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(f). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center shall ask all applicants and employees who may have direct contact with inmates about previous misconduct described in paragraph 1 of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. In addition to the Self Evaluation required per General Order 3003.00 - *Performance Evaluations*, Judicial Services Bureau members shall complete the *PREA Self Evaluation Questionnaire*. The Detention Center shall also impose upon employees a continuing affirmative duty to disclose any such misconduct."

During the onsite phase of the audit, the auditor interviewed a human resources specialist. She stated that a questionnaire is provided for all applicants as part of the hiring process. Additionally, all staff members are required to complete a self-evaluation as part of their annual evaluation that includes a questionnaire with sexual abuse questions. During the hiring process, applicants are asked about their history and any incidents of sexual abuse and sexual harassment. The application and questionnaires include a statement that applicants and staff are required to immediately report any misconduct. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(g). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Material omissions regarding such misconduct or the provision of materially false information is grounds for termination." The auditor was provided with the *Hernando County Sheriff's Office Supplemental Questionnaire* and the *Sheriff's Office Law Enforcement Employment Application Form*, both of which include a statement that omissions of fact are automatic grounds for termination.

During the onsite phase of the audit, the auditor interviewed a human resources specialist. She stated the agency will terminate any employee for false or omitted information provided during the application process or omissions of fact of any information, including sexual abuse and sexual harassment. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.17(h). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Unless prohibited by law, the

	<p>agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”</p> <p>During the onsite phase of the audit, the auditor interviewed a human resources specialist. She confirmed that internal affairs staff members would, in fact, provide potential new employers with information regarding a past employee’s sexual abuse and sexual harassment allegations and/or investigations. She stated that there is no law prohibiting this in Florida. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) 2. Interviews: <ol style="list-style-type: none"> 1. Agency head 2. PREA coordinator <p>Findings (by provision):</p> <p>115.18(a). In the PAQ, the auditor was provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “When designing or acquiring any new facility and in planning any substantial expansion or modification, of existing facilities, the Hernando County Detention Center shall consider the effect of the design, acquisition, expansion, or modification upon the Detention Center’s ability to protect inmates from sexual abuse.” Based on the auditor’s review of the agency website and the facility characteristics provided, it is clear there have been no design changes of the current facility or acquisitions of new facilities by the agency since August 20, 2012.</p> <p>During interviews with the Major, the jail administrator, and the PREA coordinator, the auditor confirmed that there have been no design changes in the facility and no new acquisitions. Both confirmed, however, that the PREA coordinator would be part of any future agency growth to consider how the design, acquisition, expansion, or modification would affect the agency’s ability to protect incarcerated individuals from sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.18(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “When installing or updating a video monitoring system, electronic surveillance system or other monitoring technology, the Hernando County Detention Center shall consider how such technology will enhance the ability to protect inmates from sexual abuse.” The auditor read in the 2024 staffing plan that there had been no need to update the facility’s video monitoring system in the facility based on a review performed.

During interviews with the Major, the jail administrator, and the PREA coordinator, the auditor learned that although there had been upgrades or changes to the video monitoring system, one update was performed to provide additional modesty for the incarcerated individuals. The County’s IT Department has added a black box to block the view of the toilet for all cells where an in-cell camera is installed. This ensures that HCDC maintains the maximum view for the safety and security of the incarcerated individuals but provides protection from cross-gender viewing as required in the PREA standards. The auditor was told the agency would continue to monitor and review at least annually where upgrades to the system were necessary to ensure sexual safety and to assist with the elimination of any blind spots. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. <i>Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault</i> 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 3. Site Review Observations: <ol style="list-style-type: none"> 1. Medical services <p>Findings (by provision):</p> <p>115.21(a). In the PAQ, the auditor was provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “All reports of sexual abuse and sexual harassment shall be investigated by the Hernando County Sheriff’s Office. The agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.”</p>

During the onsite phase of the audit, the auditor interviewed 12 random staff members. Each staff member stated investigations for allegations of sexual abuse and sexual harassment are initiated by the staff member that receives the allegation and facility supervisors begin the internal investigation. The Detention Inspector, a detective assigned to corrections, performs the investigation. Criminal investigations are performed by the detectives from the Hernando County Sheriff's Office. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.21(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The protocol shall be developmentally appropriate for youth where applicable and as appropriate, shall be adapted from or otherwise based on the most recent edition of the 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."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. The inspector confirmed that all investigations of sexual abuse in the facility are performed just as they are performed in the community. He stated that investigators would collect and process evidence under the same protocols that are utilized at all crime scenes. These protocols are used for all evidence collection related to any criminal and administrative investigation in the County and are consistent with the *National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents*. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.21(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center offers victims of sexually abusive penetration access to a forensic medical exam, without financial cost, where evidentiary or medically appropriate. The examination shall be conducted by a Sexual Assault Forensic Examiners (SAFE) or a Sexual Assault Nurse Examiner (SANE) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified forensic medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs." The facility also provided the *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault (MOU)*. The parties of the MOU are the Hernando County Sheriff's Office and the Dawn Center of Hernando County. The Dawn Center is a nonprofit rape crisis center, certified by the Florida Council Against Sexual Violence. The MOU requires the Center to provide a SAFE or SANE in the event an incarcerated individual is victimized by sexual assault and requires forensic medical examination based on the evidence of the assault. The agency indicated in the PAQ that there were no forensic examinations performed for incarcerated victims during the 12 months prior to the onsite audit.

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. The inspector confirmed that all forensic examinations for sexual abuse victims in the Hernando County Detention Center would be performed at the Dawn Center. The Center always has a SANE on duty or on call. The facility does not have a plan in

place if a SAFE or SANE is not available, since the Center will always have one on duty. The auditor contacted the executive director at the Dawn Center and confirmed the provisions of the MOU. She told the auditor that a SAFE or SANE is always available and incarcerated individuals would receive services commensurate with the services provided to a person in the community. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.21(d). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center provides inmates access to an outside victim advocate where they can receive emotional support services related to sexual abuse. The mailing address for the Dawn Center of Hernando County is P.O. Box 6179 Spring Hill, FL 34611. In addition, there are two telephone numbers for the Hernando County Dawn Center (Office: 352-686-8759; Hotline: 352-686-8430), these numbers are also posted throughout the facility and in each housing unit." The facility also provided the *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault (MOU)*. The MOU requires the Center to provide a victim advocate for the incarcerated victim for several services, including the forensic medical examination. The MOU states the advocate would be available 24 hours a day, seven days a week, so there would not be a reason for the facility to provide an alternative community-based advocate.

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He confirmed the MOU and a great working relationship with the staff at the Center. He maintains communication with the Center's director to ensure their availability to the incarcerated individual population. The auditor interviewed three (3) incarcerated individuals who had filed an allegation of sexual abuse. All three stated their report did not allege physical contact that required a forensic medical examination. All three individuals were aware of the services of a victim advocate but did not request those services. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.21(e). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "As requested by the victim, the victim advocate shall be allowed to accompany and support the victim through the forensic medical examination process and investigatory process, and shall provide emotional support, crisis intervention, information and referrals." The facility also provided the *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault (MOU)*. The MOU requires the Center to provide a victim advocate for the incarcerated victim for several services, including the forensic medical examination, individual counseling, advocacy, and follow-up sessions.

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He confirmed the MOU and a great working relationship with the staff at the Center. He maintains communication with the Center's director to ensure their availability to the incarcerated individual population. The auditor interviewed three (3) incarcerated individuals who had filed an allegation of sexual abuse. All three stated their report did not allege physical contact that required a forensic medical examination. All three individuals were aware of the services of a victim advocate but did not request those

	<p>services. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.21(f). Since sexual abuse investigations are performed by the agency, this provision does not apply to the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.21(g). The auditor is not required to audit this provision.</p> <p>115.21(h). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “For the purposes of this section, 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.”</p> <p>The agency does not utilize their own staff members to provide victim advocate services. This is provided through the agreement with the Dawn Center of Hernando County. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff <p>Findings (by provision):</p> <p>115.22(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. This policy states, “The Hernando County Detention Center shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.” HCDCC indicated in the PAQ that there were 21 administrative investigations and eight (8) criminal investigations initiated during the 12 months prior to the onsite audit.</p> <p>During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator, who confirmed that the agency takes all allegations of sexual abuse</p>

very seriously. The agency has a zero-tolerance for sexual abuse and will investigate all allegations, regardless of when they are reported and how they are reported. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.22(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, “The Hernando County Detention Center is responsible for investigating all allegations of sexual abuse or sexual harassment. In the event that the Detention Inspector is not available to completed the investigation a request shall be made to the Hernando County Sheriff’s Office for another investigator.”

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. The inspector confirmed that the agency investigates all allegations of sexual abuse and sexual harassment. The auditor reviewed the facility’s incident reports and grievances from the previous 12 months. The auditor could not find any reports or grievances related to sexual abuse or sexual harassment that were not investigated properly. The auditor also reviewed the institution’s sexual abuse and sexual harassment allegations from the previous 12 months. There were 21 allegations that were investigated properly by the Detention Inspector.

The auditor reviewed the Hernando County Sheriff’s Office web page, and under the page heading for Detention, there is a link for PREA. This page lists the agency’s zero-tolerance information and directs the public to call the PREA hotline, contact the PREA Coordinator, or contact the Sheriff’s Office to report incidents of sexual abuse or sexual harassment, if needed. The agency’s PREA policy is also posted. The information can be found here: **PREA Information (hernandosheriff.org)**. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.22(c). All investigations for sexual abuse and sexual harassment at the HCDC are performed by the agency and not an outside agency. Therefore, this provision is not applicable. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.22(d). The auditor is not required to audit this provision.

115.22(e). The auditor is not required to audit this provision.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)

1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. Training curriculum
 3. Training logs
2. Interviews:
 1. PREA coordinator
 2. Random staff

Findings (by provision):

115.31(a). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, "All employees shall receive training necessary to fulfill their responsibilities in the prevention, detection, and response to inmate sexual abuse allegations. PREA training shall be included in the Detention Center FTO Program and completed within 30 days of issuance.

Training courses at a minimum will include the following: Zero tolerance policy for sexual abuse and sexual harassment; How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; An inmates' right to be free from sexual abuse and sexual harassment; The right of inmates and employees to be free from retaliation from reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with inmates; How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; Medical and mental health duties; Initial contact/securing the crime scene." The training curriculum for staff members was provided to the auditor in the PAQ. The curriculum is well produced and clearly covers all required points in this provision.

During the onsite phase of the audit, the auditor interviewed 12 random staff members and spoke informally with several staff members. Each person interviewed indicated that they received PREA education prior to beginning work in the secure facility or had received it during their last annual in-service training. Each person interviewed confirmed the training included the ten points required under this standard. The auditor was also told that they get annual refresher training online or in the classroom and must take the class and sign off on a document to show completion. The auditor reviewed training records provided by the PREA coordinator. The auditor was able to view training completion records for ten randomly selected staff member files. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.31(b). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, "Deputies shall be trained to comply with standards, to supervise all genders, and to properly handle any allegation made from the inmate population."

The HCDC houses both male and female incarcerated individuals. Training for all staff, therefore, is consistent and there is no need to provide additional training related to a specific gender. Also, the agency has only one facility and there is no requirement to prepare training for additional facilities with different incarcerated individual populations. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.31(c). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, “Refresher training is mandatory and provided on an annual basis.”

During the onsite phase of the audit, the auditor interviewed 12 random staff members and spoke informally with several staff members. Each person interviewed indicated that they received PREA education prior to beginning work in the secure facility or had received it during their last annual in-service training. The auditor was also told that they get annual refresher training online or in the classroom and must take the class and sign off on a document to show completion. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.31(d). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, “All employees shall verify through electronic signature that they understand the training they have received.” All classroom training and online classes require staff to acknowledge, in writing or electronically, they understand and will comply with the training on PREA. The facility requires that all staff complete the online training module annually or in the classroom setting, and this training includes an online or handwritten test to confirm completion of the class and understanding of the concepts provided in the training. Training logs provided in the PAQ were from the last two years. They show completion of the annual training related to sexual abuse and sexual harassment and the date it was completed.

The auditor reviewed random training records during the onsite phase of the audit. The records show acknowledgement of completion of the PREA training on an annual basis. Records show full completion of the training by staff. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	The following evidence was analyzed in making the compliance determination:
	1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)

1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *Guide on Sexual Abuse/Harassment Prevention, Detection and Response for Volunteer, Contractors, and Official Visitors*
 3. Training curriculum
2. Interviews:
 1. Specialized staff

Findings (by provision):

115.32(a). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, “The Hernando County Detention Center shall ensure that all volunteers, contractors, and official visitors who have contact with inmates are trained on their responsibilities in regards to this policy as it relates to the prevention, detection, and response to inmate sexual abuse and sexual harassment allegations. Contractors, volunteers, and official visitors are required to sign the form *Guide on Sexual Abuse/Harassment Prevention, Detection and Response for Volunteer, Contractors, and Official Visitors* before entering the facility.” In the PAQ, HCDC indicated there are a total of 88 approved volunteers and one (1) contractor who had received the required education.

During the onsite phase of the audit, the auditor interviewed one (1) contractor. The contractor, the facility’s physician, confirmed completion of the sexual abuse and sexual harassment education prior to being granted access to the secure facility. He stated he has been the sole contracted physician for the agency for seventeen years. He is provided with a refresher on the education every year. Unfortunately, the auditor was not able to interview a volunteer during the onsite audit. When the auditor arrived at the HCDC to perform the onsite audit, he was required to log onto the kiosk in the facility’s lobby and read and sign, verifying acknowledgement of understanding of the agency’s zero tolerance policy. A copy of the signed document was immediately sent to the auditor’s email. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.32(b). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, “The Hernando County Detention Center shall tailor training for volunteers and contractors based on the services they provide and the level of contact they have with inmates. At a minimum all volunteers and contractors shall receive training in the following areas: The Hernando County Detention Center zero tolerance policy for sexual abuse and sexual harassment; Sexual abuse and sexual harassment reporting duties; How to report sexual abuse to security staff and/or other parties, when appropriate.” The auditor was provided with the volunteer and contractor training curriculum in the PAQ. The curriculum includes information regarding the facility’s zero-tolerance policy, how to properly report allegations of sexual abuse, and how to avoid sexual misconduct with incarcerated individuals. It was detailed and provided all the information required under this provision.

During the onsite phase of the audit, the auditor interviewed one (1) contractor. The

contractor, the facility's physician, confirmed completion of the sexual abuse and sexual harassment education prior to being granted access to the secure facility. He stated he has been the sole contracted physician for the agency for seventeen years. He is provided with a refresher on the education every year. Unfortunately, the auditor was not able to interview a volunteer during the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.32(c). In the PAQ, the facility provided a copy of their *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, "The Hernando County Detention Center shall ensure that all training courses developed for the training of volunteers and contractors in relationship to PREA require the individual receiving training to sign documentation stating that they understand the training that they have received."

During the onsite phase of the audit, the auditor reviewed training records for several volunteers and other random records. Based on this analysis, the auditor finds the facility in compliance with this provision.

The auditor reviewed the annual curriculum used for volunteers and contractors and found the curriculum to be very detailed and specific to those that will have direct physical contact with incarcerated individuals. Also, the auditor was subjected to the same educational requirements before he was admitted to the facility. The document that was presented is detailed and provides clear statements regarding conduct that is prohibited with incarcerated individuals and strongly identifies the requirement to report knowledge of sexual abuse or sexual harassment of an incarcerated individual. With these provisions in place for the education of all volunteers and contractors that enter the institution and may have physical contact with housed individuals, the auditor considers the agency to have exceeded this standard.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. <i>PREA Pamphlet - End the Silence</i> 3. <i>PREA Compliance Acknowledgement Form</i> 4. Video - PREA: What You Need to Know 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Random staff

3. Random incarcerated individuals
3. Site Review Observations:
 1. Housing units
 2. Intake

Findings (by provision):

115.33(a). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Inmate orientation begins in Booking during the admissions process. While in Booking, deputies/technicians inform inmates verbally and through written material via the *PREA Pamphlet* of the Hernando County Detention Centers zero tolerance policy regarding sexual abuse and sexual harassment. The pamphlet includes information for reporting incidents or suspicions of sexual abuse and sexual harassment. The Inmates will acknowledge that they have received the material by signing the *PREA Compliance Acknowledgement* form. The form shall be maintained in the inmate's classification file. While in Booking, inmates are informed how to access the information and rules in the *Inmate Handbook*. The *Inmate Handbook* is available in English and Spanish on the Mail Guard kiosk or through an electronic request submitted to the Programs Deputy. The *Inmate Handbook* and *PREA Pamphlet* will include a written explanation of the following: How to report incidents or suspicions of sexual abuse and sexual harassment; Information regarding the toll free confidential hotline which is used only for reporting sexual abuse and sexual harassment; Sexual abuse and sexual harassment prevention, intervention, self-protection, reporting, confidentiality of information, and how to receive treatment and counseling." The auditor was provided with a copy of the *PREA Pamphlet - End the Silence*, in the PAQ. The pamphlet clearly identifies the facility's zero-tolerance policy and informs the incarcerated individuals of the many ways to report incidents of sexual abuse while incarcerated. In the PAQ, HCDC indicated there were 5,113 individuals admitted to the facility over the previous 12 months prior to the onsite audit and all 5,113 individuals were provided the PREA education at intake.

During the onsite phase of the audit, the auditor entered the Intake/Booking area and saw copies of the *PREA Pamphlet - End the Silence*, which were available for distribution to the incarcerated individuals in booking. The auditor was present while the intake deputy processed a new intake individual following her arrest and transport to the facility. The female deputy (because the intake was a female) performed a pat search for contraband after verifying the individual's identification as a female. The deputy then took possession of her property, performed a body scan, dressed her into a jail uniform, took her photo, fingerprinted her, then assisted in the completion of her intake paperwork, which included the *PREA Compliance Acknowledgement* form. The individual was not strip searched based on her charge, as it was eligible under the Florida State Statutes. The incarcerated individual was then presented with the *PREA Pamphlet - End the Silence*, and the deputy explained the agency's zero tolerance policy. The individual was then asked to sign the *PREA Compliance Acknowledgement* form.

The auditor interviewed the intake deputy and confirmed that all incarcerated individuals receive the same *PREA Pamphlet - End the Silence* and are asked to sign the *PREA Compliance Acknowledgement* form. These documents are presented to all individuals that are admitted to the facility. The auditor also interviewed 18 random incarcerated individuals during the onsite phase of the audit. All 18 incarcerated individuals confirmed that they understood the PREA information and how to ask for help or file a report. All 18 incarcerated individuals confirmed receiving the PREA pamphlet at intake. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.33(b). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, “The Hernando County Detention Center provides comprehensive education to all inmates within 30 days following the intake process. The comprehensive education for inmates will include at a minimum: An inmates’ rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents; Agency sexual abuse response policies and procedures. The PREA Video plays in each housing unit throughout the facility. Shift commanders shall document once each shift in Guardian RFID that the video has played.” In the PAQ, HCDC indicated there were 1,523 incarcerated individuals admitted to the facility whose length of stay was 30 days or more, and all 1,523 individuals had received comprehensive PREA education.

During the onsite phase of the audit, the auditor observed in each housing unit a television dedicated to educational materials for the incarcerated individuals. The auditor was told a PREA video plays on the television two times per week. The video has closed captions and runs a second time in Spanish so all individuals can take part in the education. The auditor also viewed the PREA education on the kiosk in the housing units.

The auditor interviewed 18 random incarcerated individuals during the onsite phase of the audit. All 18 incarcerated individuals had been housed in the facility for at least 30 days. Each of the incarcerated individuals confirmed that they had viewed the video and were aware of their right to be free from sexual abuse and sexual harassment, free from retaliation for reporting abuse and that the agency would properly respond to incidents of such abuse. Most of the individuals also stated they could read the PREA information on the kiosk at any time. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.33(c). The facility provides all incarcerated individuals with education regarding PREA at intake and during orientation. The PREA coordinator stated that all incarcerated individuals receive initial education at intake and then view the comprehensive PREA video in their housing units. The agency does not have any additional facilities, so additional PREA education is not required upon transfer. The agency has been audited prior to this audit, so the auditor understands all individuals had been educated about PREA previously. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.33(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was

provided to the auditor in the PAQ. The policy states, "Inmate education is continuously and readily available in multiple formats including for those inmates who are limited English proficient, deaf, visually impaired, otherwise disabled, as well as inmates who have limited reading skills."

During the onsite phase of the audit, the auditor could see zero tolerance signs in each of the housing units and in several other locations that were provided in English and Spanish. The signs inform incarcerated individuals of their right to be free from sexual abuse and sexual harassment, free from retaliation for reporting abuse and that the agency would properly respond to incidents of such abuse. Also, the incarcerated individuals receive the *PREA Pamphlet - End the Silence*, which is available in Spanish for those that require it. The PREA coordinator did provide documentation for Standard 115.16 to show that the facility has access to the language line and to American Sign Language interpreters, if needed. When asked, the PREA coordinator stated that he could read a blind incarcerated individual the required PREA education if it was necessary. The auditor interviewed two (2) incarcerated individuals who spoke Spanish and they confirmed that the facility provided the education in Spanish in the pamphlet and on the video. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.33(e). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Inmates will acknowledge that they have viewed the PREA video and received inmate education by signing the PREA Video form on the Mail Guard kiosk. The Hernando County Detention Center maintains documentation of inmate participation in these education sessions."

During the onsite phase of the audit, the auditor was supplied with copies of signed *PREA Compliance Acknowledgement* forms showing proof of PREA education for the incarcerated individuals. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.33(f). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Educational formats include videos, posters, inmate handbooks, kiosks, and information stations in each of the housing units."

During the site review, the auditor could see many forms of PREA education readily available for incarcerated individuals. In all housing units there are signs posted in English and Spanish. These signs remind incarcerated individuals that sexual abuse is not tolerated and provide the hotline number, as well as the information for available counseling services. The incarcerated individuals all have access to the kiosk where they can access information about PREA and have access to a grievance to complete if needed. This same information is readily available on the incarcerated individual's tablet. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.34 Specialized training: Investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)
 2. Training curriculum - PREA - Training for Investigators of Sexual Abuse in Confinement Settings
 3. Training certificate
2. Interviews:
 1. Specialized staff

Findings (by provision):

115.34(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "To ensure compliance with the standards of PREA, inspectors for the Hernando County Detention Center shall receive training in conducting sexual abuse investigations in a confinement setting. When sexual abuse is alleged, the agency will use investigators who have received special training in sexual abuse investigations pursuant to 115.34."

The auditor interviewed the Detention Inspector during the onsite phase of the audit. The inspector confirmed that he had attended the investigations course provided by the American Jail Association (AJA) and had successfully received his certificate. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.34(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The specialized training for inspectors shall include the following areas: Techniques for interviewing sexual abuse victims; Proper use of Miranda and Garrity warnings; Sexual abuse evidence collection in confinement settings; Criteria and evidence required to substantiate a case for administrative action or prosecution referral." HCDC provided in the PAQ the training agenda for an investigations class sponsored by the AJA, entitled *PREA - Training for Investigators of Sexual Abuse in Confinement Settings*. This training curriculum is known to the auditor and includes modules related to the four points required under this provision of the standard. The auditor was also provided with a copy of the inspector's training certificate for the course, verifying his attendance and completion.

The auditor interviewed the Detention Inspector during the onsite phase of the audit. The inspector confirmed that he had attended the investigations course provided by the AJA and had successfully received his certificate. He confirmed the curriculum includes the four required points from this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

	<p>115.34(c). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “The Hernando County Detention Center shall maintain written verification that agency inspectors have completed specialized training in conducting sexual abuse investigations.”</p> <p>The PREA coordinator maintains a file with written proof for detectives who have completed the specialized investigations class. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.34(d). The auditor is not required to audit this provision.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Training curriculum - <i>Specialized Training: PREA Medical and Mental Health Standards</i> 3. Training roster 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff <p>Findings (by provision):</p> <p>115.35(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Medical and mental health staff shall receive additional training related to PREA in the following areas: How to detect and assess signs of sexual abuse and sexual harassment; How to preserve physical evidence prior of sexual abuse; How to respond effectively and professionally to victims of sexual abuse and sexual harassment; How to and whom to report allegations or suspicions of sexual abuse and sexual harassment.” The auditor was provided with the lesson plan from the course, entitled <i>Specialized Training: PREA Medical and Mental Health Standards</i>. This course is widely available through the PREA Resource Center website, and the auditor is aware of the curriculum and knows it to include the required points for this provision.</p> <p>During the onsite phase of the audit, the auditor interviewed the facility’s health care administrator, a nurse, and a mental health counselor. All three staff members confirmed completion of the basic PREA education as well as the specialized medical education required in this provision. They told the auditor that the education is</p>

provided online, and completion of the class is documented once completed. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.35(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Detention Center medical staff do not conduct forensic examinations. The PREA Inspector shall make arrangements with the local certified rape crisis center (Dawn Center) for any inmates who need forensic examinations."

During the onsite audit, the auditor learned forensic medical examinations would not be performed inside the facility. Any incarcerated individual who would require the forensic medical examination due to a sexual assault will be transported to the Dawn Center if the examination was necessary. Therefore, the facility medical staff do not receive training related to these exams. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.35(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center shall maintain written verification of all medical and mental health staff who have received specialized training in detecting, assessing, and responding to sexual abuse victims." In the PAQ, the agency provided the training roster showing the 29 medical and mental health staff members, including the contracted physician, had completed the online specialized medical course. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.35(d). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Medical and mental health staff shall also receive the training mandated for employees under 115.31 or for contractors and volunteers under 115.32, depending upon the practitioner's status with the agency."

During the onsite audit, the auditor interviewed the facility's health care administrator, a nurse, and a mental health counselor. All three staff members confirmed completion of the basic PREA education as well as the specialized medical education. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following evidence was analyzed in making the compliance determination: 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)

1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *Hernando County Sheriff's Office PREA Questionnaire*
 3. Screening records
2. Interviews:
 1. Specialized staff
 2. Random incarcerated individuals
 3. Site Review Observations:
 1. Intake/Booking
 2. Classification

Findings (by provision):

115.41(a). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "The Hernando County Detention Center ensures that all inmates are screened to assess their risk of being sexually abused by other inmates and/or their risk of being sexually abusive toward other inmates at the following times."

During the onsite phase of the audit, the auditor interviewed the classification supervisor. He explained the process for medical staff and classification staff to complete the risk screening for abusiveness and the tendency to be a predator. The auditor observed the nurse in intake performing the intake screening for a new intake individual shortly after they were received and processed for intake in the facility. The auditor confirmed with the classification supervisor that this screening is completed for all newly incarcerated individuals when they enter the facility. The auditor interviewed 18 random incarcerated individuals and each incarcerated individual could recall being asked these specific questions during the intake process. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(b). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "Initial intake/ classification - New inmate intakes are screened for risk within 24 hours of arrival to the facility. The risk screening is conducted alongside the medical intake." In the PAQ, HCDC stated that there were 2,503 incarcerated individuals admitted to the facility whose length of stay was for at least 72 hours or more. Of those, all had completed the intake risk assessment.

During the onsite phase of the audit, the auditor reviewed several incarcerated individual files which all included the screening form. Each of the forms reviewed were completed on the first day of the incarcerated individual's arrival in the facility. The auditor interviewed the classification supervisor, who confirmed the intake risk screening process on the day of the individual's arrival to the facility, well before the required 72 hours in this provision. The auditor interviewed 18 random incarcerated individuals and each incarcerated individual related that they completed the screening questionnaire on the day of their arrival in the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(c). The facility supplied a copy of *HCSO General Order 7040.25 - Prison*

Rape Elimination Act (PREA) in the PAQ. This policy states, “The Hernando County Detention Center ensures that medical staff members and Classification Unit Deputies who are screening inmates are provided with an objective written screening instrument title *PREA Questionnaire*.” The facility provided a copy of the risk screening tool, the *Hernando County Sheriff’s Office PREA Questionnaire*, in the PAQ. The auditor reviewed the screening tool to determine if it was objective. The screening tool requires a simple yes or no answer to each of the questions and the scoring system is standard for everyone screened. Because the screening tool does not allow for subjective answers, the tool is objective. The outcome for the potential to be victimized or become a predator is based on a standard scoring system. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(d). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization or abusiveness: What is the age of the detainee (date of birth)? Does the detainee have an obvious mental, physical, or developmental disability? Does the detainee have a small physical stature (males only 5’6” or less and/or 140lbs or less)? Is the detainee a male who is overtly effeminate, or a female who is overtly masculine in appearance? Is the detainee perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming? Do you feel that you are vulnerable to sexual victimization? Have you previously experienced sexual victimization? Do you have a history of sexually predatory behavior?” The facility provided a copy of the risk screening tool, the *Hernando County Sheriff’s Office PREA Questionnaire*, in the PAQ. The screening tool lists each of the criteria listed in standard 115.41(d). Additionally, the screening tool provides space for the screener to add comments based on the observations of the screener regarding the incarcerated individual’s potential for vulnerability.

During the onsite phase of the audit, the auditor spoke with the classification supervisor. He confirmed the risk screening tool includes all the criteria listed in this provision. He explained that medical staff and classification staff members speak directly with the incarcerated individual to complete the screening tool and ask all the questions on the tool. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(e). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “The following criteria shall be used to assess an inmate’s risk for being sexually abusive and is completed by Classification staff: Has the inmate been previously incarcerated? Does the inmate have a history of institutional violence? Is the inmate’s criminal history exclusively nonviolent? Does the inmate have prior convictions for sex offenses against an adult or child? Is the inmate being detained solely for civil immigration purposes?” The facility provided a copy of the risk screening tool, the *Hernando County Sheriff’s Office PREA Questionnaire*, in the PAQ. The screening tool provided to the auditor includes a section for the screener to note prior acts of sexual abuse, prior convictions for violent offenses and history of prior institutional violence or sexual abuse. These items are included to enable the screener to review those

responses during the evaluation process.

During the onsite phase of the audit, the auditor spoke with the classification supervisor. He confirmed the risk screening tool includes all the criteria listed in this provision. He stated that classification staff members may utilize the individual's criminal history to assist in completing this section of the screening tool. The auditor was told that this screening section is necessary to verify that incarcerated individuals with a potential to be a predator will not be housed with incarcerated individuals with a potential to be a victim. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(f). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided in the PAQ. The policy states, "Within 30 days from the inmate's arrival at the Detention Center, the inmate's risk of victimization or abusiveness shall be reassessed based upon any additional relevant information received by the facility since the intake screening. The Classification Unit will reassess all inmates within 30 days from their arrival at the facility by using the *PREA Questionnaire Re-assessment*. The reassessment is kept in the inmates Classification file. If there is any indication that sexual abuse or harassment occurred within the facility an investigation will be initiated." In the PAQ, HCDC stated that there were 1,523 incarcerated individuals whose length of stay in the facility was at least 30 days. Each of the 1,523 individuals had received a reassessment performed by a classification staff member.

The auditor interviewed the classification supervisor during the onsite phase of the audit. He confirmed that incarcerated individuals are reassessed within the 30-day time period, which is completed by classification staff members. The auditor was provided with several completed screening forms for incarcerated individuals that were in custody and the auditor was able to confirm completion of the reassessment. The auditor witnessed the classification supervisor perform the reassessment for an individual who had been housed for 28 days. During the onsite audit, the auditor interviewed 18 random incarcerated individuals. The auditor asked if they were asked additional follow-up questions from the risk screening, and each confirmed this reassessment. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(g). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "An inmate's risk level shall be reassessed when warranted due to a referral, request, or incident of sexual abuse or sexual harassment or receipt of any additional information that bears on the inmate's risk of sexual victimization or abusiveness. The PREA Inspector shall complete the *PREA Questionnaire Re-assessment* anytime an investigation is conducted."

The auditor interviewed the classification supervisor during the onsite phase of the audit. He stated that they will reassess an incarcerated individual at any time based on information that is received from other staff, incarcerated individuals, or through incident reports. Also, the inspector performs the reassessment following the receipt of an allegation of sexual abuse or sexual harassment. The auditor interviewed 18 random incarcerated individuals. The incarcerated individuals stated they were not

familiar with this process, but several did recall being asked follow-up questions by medical staff or classification staff. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(h). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “Inmates shall not be disciplined for refusing to answer or for not disclosing complete information in section (a) above in responses to questions asked during the risk assessments.”

The auditor interviewed the classification supervisor during the onsite phase of the audit. He stated incarcerated individuals would never be disciplined if they chose not to answer the questions. Although the responses were important for staff to be able to safely house incarcerated individuals, the facility could still safely house an incarcerated individual without the responses, but with additional monitoring for incarcerated individual safety. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.41(i). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “The Hernando County Detention Center implements appropriate controls on the dissemination within the facility of responses to questions asked pursuant to risk screenings to ensure privacy of sensitive information that may be used for exploitation by staff or other inmates. The *PREA Questionnaire* is sent to the Classification Unit and kept in the inmate’s Classification file.”

During the onsite phase of the audit, the auditor interviewed the PREA coordinator and the classification supervisor. Both confirmed that the information in the screening tool was only available for review by the PREA coordinator, the jail administrator, and classification staff. During the site review, the auditor asked several random staff members to provide the auditor with this information and no staff could provide the auditor with the information or access in the computer. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Screening records 2. Interviews:

1. Specialized staff
2. Targeted incarcerated individuals

Findings (by provision):

115.42(a). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "The Detention Center shall use all the information from the risk screening/*PREA Questionnaire* to determine housing and bed location, work, education and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive."

During the onsite phase of the audit, the auditor interviewed the classification supervisor and the PREA coordinator. They both confirmed that housing assignments, classification, and access to programs are all impacted by the information derived from the risk screening. The auditor reviewed several completed screening assessments and could see the final determination for housing was obtained through this document. Therefore, the outcome of the incarcerated individual screening is utilized to safely house, classify, and schedule incarcerated individual programs.

Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(b). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states. "The agency shall make individual determinations about how to ensure the safety of each inmate."

During the onsite phase of the audit, the auditor interviewed the classification supervisor. He stated that classification reviews the risk screening outcomes along with all other classification information to make individual decisions for housing assignments, classification, and access to programs for incarcerated individuals. The auditor reviewed several completed screening assessments and could see the final determination for housing was obtained through this document. These housing decisions are determined on an individual basis and are not based on any other incarcerated individual or housing limitations in the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(c). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "The Detention Center shall make the decision to assign a transgender or intersex inmate to a male or female housing unit and programming assignments on a case by case basis. Such placement considerations should ensure the inmate's health and safety and prevent management and security issues."

During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who confirmed that transgender incarcerated individuals are reviewed on a case-by-case basis, which is consistent with the policy. During the risk screening process, they would consider the transgender incarcerated individual's own perceptions regarding his or her own safety and where he or she would feel safest for housing. Consideration for housing is not based strictly on genitalia. The auditor was able to

review the risk screening for one (1) transgender incarcerated individual who had been in the facility earlier in the year. The auditor was unable to interview any transgender individuals regarding this provision, as there were no transgender individuals housed in the facility at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(d). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice per year to review any threats to safety experienced by the inmate."

The auditor interviewed the classification supervisor and the PREA coordinator during the onsite phase of the audit. Both confirmed that this review would be performed at least twice per year for the safety of any transgender person or intersex incarcerated individual. The classification supervisor stated that he would likely be the person to perform the rescreening, which would be set on a calendar to ensure the screening is completely timely to meet the standard. The auditor was unable to interview any transgender individuals regarding this provision, as there were no transgender individuals housed in the facility at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(e). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration."

The auditor interviewed the classification supervisor and PREA coordinator during the onsite phase of the audit. Both confirmed that incarcerated individuals are reviewed on a case-by-case basis, which is consistent with the policy. They would consider the transgender incarcerated individual's own perceptions regarding his or her own safety and where he or she would feel safest for housing. Consideration for housing is not based strictly on genitalia. The auditor was able to review the risk screening for one (1) transgender incarcerated individual who had been in the facility earlier in the year. The auditor was unable to interview any transgender individuals regarding this provision, as there were no transgender individuals housed in the facility at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(f). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates, upon request. If a transgender and intersex inmate requests to shower separately, the inmate shall be escorted to medical to shower."

The auditor interviewed the classification supervisor and PREA coordinator during the onsite phase of the audit. Both confirmed that all transgender incarcerated individuals are provided the opportunity to shower separately from the general incarcerated individual population. During the site review, the auditor noted that this

separation for showers would be easily achieved in nearly all housing units, as the showers were separate with a shower curtain covering that would provide adequate privacy and modesty for the transgender individual. This would only be an issue in the open dormitory housing units. The auditor was unable to interview any transgender individuals regarding this provision, as there were no transgender individuals housed in the facility at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.42(g). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “The Detention Center shall not place lesbian, gay, bisexual, transgender or intersex inmates in dedicated units solely on the basis of such identification or status, unless such placement is in a dedicated unit established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.”

The auditor interviewed the PREA coordinator during the onsite phase of the audit. He stated the facility does not have a housing unit dedicated for lesbian, gay, or transgender individuals. He also confirmed that there is no consent decree or legal determination in place that would allow the facility to designate a housing specifically for lesbian, gay, and transgender individuals. During the site review, the auditor reviewed each housing unit and viewed the full housing roster and noted no housing unit that was assigned for LGBT housing.

During the onsite audit, the auditor interviewed four LGB individuals. All four confirmed that they are housed in general population and are not housed in separate LGBT housing. The auditor was unable to interview any transgender individuals regarding this provision, as there were no transgender individuals housed in the facility at the time of the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Screening records 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals 3. Site Review Observations:

1. Segregated housing units

Findings (by provision):

115.43(a). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while conducting the assessment."

During the onsite phase of the audit, the auditor reviewed screening records for several incarcerated individuals who were assessed to be at a high risk for victimization. None of the incarcerated individuals were housed involuntarily in a segregation housing unit. The auditor was unable to identify any incarcerated individual housed in segregation due to their high risk for sexual victimization. The auditor interviewed the Major, the jail administrator, who confirmed that the facility would not place incarcerated individuals in involuntary segregation to keep the incarcerated individuals safe in custody. The auditor was told that incarcerated individuals may request protective custody to remain safe, and if this is approved, the placement is documented properly. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43(b). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, "Inmates placed in segregated housing in accordance with section 6 above, shall have access to programs, privileges, education, and work opportunities to the extent possible, if restricted it must be documented in JMS with the following: The opportunities that have been limited; The duration of the limitation; The reason for the limitation."

During the onsite phase of the audit, the auditor interviewed a staff member that works in the segregated housing unit. It was confirmed that the facility provides segregated incarcerated individuals full access to programs and services, just as any other incarcerated individual, as security allows. The auditor spoke with incarcerated individuals that were housed in segregation and learned that incarcerated individuals can receive mail, have visitation, go to programs, and receive commissary, as long as they are not in disciplinary confinement. There were no incarcerated individuals currently in custody who had been placed in involuntary segregation based on their high risk for sexual victimization. The auditor was unable to confirm their access to services and programs. During the site review, the auditor walked through segregated housing unit and verified incarcerated individual access to telephones, kiosks, and mail. The auditor also located grievance forms available on the kiosk.

The PREA coordinator confirmed that use of segregation is limited and used as a last resort as a means to keep individuals safe from sexual abuse in the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43(c). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “The Detention Center shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed 30 days.”

During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator. He confirmed that incarcerated individuals in segregation are reviewed every week to determine if they would remain in segregated housing or if other housing alternatives are available. He stated no individuals had been placed in segregated housing to keep them safe from sexual abuse at any point over the last year. There were no incarcerated individuals in custody who were at high risk for sexual victimization and, consequently, none housed in segregation. The auditor interviewed a deputy who works in the segregated housing unit. He stated that the agency reviews individuals in segregation every week to determine if they should remain in segregation and, if so, what restrictions from facility programs, privileges, and education are necessary. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43(d). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “If the inmate is placed involuntarily in segregated housing, the documentation must include: The basis for the facilities concern for the inmate’s safety; The reason why no alternative means of separation can be arranged.”

The auditor reviewed the files for six (6) individuals held in segregation. There is a clear statement indicating the reason the individual is held in segregation and all limitations to facility services are clearly documented. None of the individuals was held in segregation due to their high risk for victimization. There were no incarcerated individuals in custody who were at high risk for sexual victimization during the onsite audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.43(e). The facility supplied a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. This policy states, “Every seven days the Detention Center conducts a Reclassification meeting during which segregated inmates are reassessed to determine if a continuing need for separation from the general population is warranted.”

During the onsite phase of the audit, the auditor interviewed a deputy who works in the segregated housing unit. He stated that the agency reviews individuals in segregation every week to determine if they should remain in segregation and, if so, what restrictions from facility programs, privileges, and education are necessary. Based on this analysis, the auditor finds the facility in compliance with this provision.

Auditor Overall Determination: Meets Standard

Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *PREA Agreement Between Northern Communication Services, Inc. and Hernando County Detention Center*
 3. *PREA Pamphlet - End the Silence*
2. Interviews:
 1. Random staff
 2. PREA coordinator
 3. Random incarcerated individuals
3. Site Review Observations:
 1. Housing units

Findings (by provision):

115.51(a). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, "Inmates are provided multiple avenues to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents to include: Any staff member, contractor, or volunteer of the Hernando County Detention Center will accept reports made verbally, in writing, anonymously, or from a third party; The PREA hotline is a toll free confidential telephone number available for inmates, staff, and the public (including third parties) to report sexual abuse and sexual harassment."

During the onsite phase of the audit, the auditor completed a site review and visited all housing units. Signs informing incarcerated individuals of the multiple reporting ways were clearly posted, in two languages, in each housing unit. The auditor asked an incarcerated individual to make a test complaint on the kiosk during the site review. The individual immediately pushed the PREA Alert button on the kiosk and the supervisors escorting the auditor were immediately notified on their cell phones. The auditor interviewed 18 random incarcerated individuals and all incarcerated individuals could easily tell the auditor several ways that they could report abuse, harassment, and concerns regarding staff neglect or lack of responsibility. The auditor interviewed 12 random staff members. All staff could list at least four different ways that incarcerated individuals could report abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.51(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, "The PREA hotline is a toll free confidential telephone number available for inmates, staff, and the public (including

third parties) to report sexual abuse and sexual harassment. The PREA Hotline is monitored by Northern Communications who receives and immediately forwards reports of sexual abuse and sexual harassment to Detention Center administrators and the Inspector. Northern Communications is tasked with answering calls promptly and to handle them in a timely and confidential manner allowing the inmate to remain anonymous upon request. Information on how to contact the PREA Hotline can be viewed through posters in each housing unit, information stations, Mail Guard kiosks, Inmate Handbook, and the agencies website.” The policy also states, “Inmates detained solely for civil immigration purposes are provided information on how to contact relevant consular officials and officials at the Department of Homeland Security.” The facility provided a copy of a *PREA Agreement Between Northern Communication Services, Inc. and Hernando County Detention Center* in the PAQ. This Agreement provides for Northern Communication to answer hotline telephone calls from the facility’s incarcerated individuals who see the need to make such a call. The Agreement requires Northern take all details from the caller, confidentially and anonymously, if the caller chooses, then send the call details to the Detention Inspector at the facility for review and potential investigation. Information about the hotline is provided to the incarcerated individuals in the facility *Handbook*, on the kiosk, in the *PREA Pamphlet*, and on signs posted throughout the facility. The facility does house incarcerated individuals solely for civil immigration and the policy directs those individuals to contact the Department of Homeland Security.

During the onsite phase of the audit, the auditor interviewed the PREA coordinator, who confirmed the existence of the PREA Agreement for the hotline. The auditor interviewed 18 random incarcerated individuals and they all stated they were aware of the available hotline that was in place to report sexual abuse inside the facility. Based on this analysis, the auditor finds the facility in compliance with this standard.

115.51(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. This policy states, “Any staff member, contractor, or volunteer of the Hernando County Detention Center will accept reports made verbally, in writing, anonymously, or from a third party.”

During the onsite phase of the audit, the auditor interviewed 12 random staff members. All staff interviewed were aware of their responsibility to take verbal reports of abuse and immediately contact a supervisor to file that report. There was one staff member that reported having received a verbal allegation from an incarcerated individual. The deputy reported to the auditor that he immediately contacted the shift supervisor, separated the victim from the abuser, secured the crime scene, ensured that each incarcerated individual was unable to destroy potential evidence, then immediately wrote an incident report of the verbal report from the incarcerated individual. Each of the 18 random incarcerated individuals interviewed were aware that they could report sexual abuse directly to any staff member. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.51(d). In the PAQ, the auditor was provided with *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. This policy states, “The PREA hotline is a toll free

	<p>confidential telephone number available for inmates, staff, and the public (including third parties) to report sexual abuse and sexual harassment.”</p> <p>The auditor interviewed 12 random staff members. All 12 deputies easily described the avenues available to privately report incidents sexual abuse and sexual harassment, including the hotline, which is available for staff as well as incarcerated individuals. Most staff members indicated they would just go directly to their immediate supervisor or to PREA coordinator to report their information. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) 2. HCDC Inmate Handbook 3. Sexual Abuse Investigation Files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals <p>Findings (by provision):</p> <p>115.52(a). The agency is not exempt from this standard, as it does have in place an administrative grievance procedure for incarcerated individuals. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.52(b). In the PAQ, the auditor was provided with <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. This policy states, “The Detention Center does not impose a time limit for an inmate to submit a grievance regarding an allegation of sexual abuse however time limits shall apply to any portion that does not allege an incident of sexual abuse, see <i>Standard Operating Procedure 7055.08 - Grievance Procedures</i>. The Detention Center does not require an inmate to use any informal grievance process or to otherwise attempt to resolve the alleged incident with staff. Nothing in section 115.52b shall restrict the Detention Center’s ability to defend against an inmate lawsuit on the grounds that the applicable statute of limitations has expired.”</p> <p>During the onsite phase of the audit, the auditor spoke with several staff members during the site review. Staff were aware that incarcerated individuals could file a</p>

grievance to make an allegation of sexual abuse. The grievances were easily accessible to all incarcerated individuals on the kiosk in each housing unit. The auditor also spoke with several incarcerated individuals during the site review. All the incarcerated individuals stated clearly that they could file a grievance for an allegation of sexual abuse. They all knew how to access the incarcerated individual kiosk and how to locate the grievance. The auditor interviewed the PREA coordinator, and he described the process for grievances in the facility. Grievances are submitted directly by the incarcerated individuals from the kiosk and appear in a mailbox that any supervisor at Sergeant level or above can access. Supervisors are expected to log into the mailbox often and screen the grievances to see which can be handled directly and which must be forwarded to a specific staff member for review and response. Any grievance received in the mailbox that references sexual abuse or sexual harassment will be forwarded immediately to the Detention Inspector for review and investigation. Any grievance that references the immediate risk of abuse to an individual is considered an emergency grievance and is immediately handled by the supervisor. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.52(c). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "An inmate who alleges sexual abuse may submit a grievance without submitting it to the staff member who is the subject of the complaint and such grievances are not referred to the staff member who is the subject of the complaint."

During the site review, the auditor completed an interview with the PREA coordinator, who confirmed that incarcerated individual grievances referencing sexual abuse would never be referred to the subject staff member, would not be held to a time frame for filing the grievance, and could be submitted to any staff member other than the subject of the grievance. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.52(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "The Detention Center issues 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. The agency may claim an extension of up to 70 days to respond if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made. At any level of the administrative process, including the final level, if the inmate does not receive a response within the allotted time to reply, including any properly noticed extension, the inmate may consider the absence of a response to be denial at that level." In the PAQ, the facility indicated there were no such grievances submitted during the 12 months prior to the onsite audit.

The auditor reviewed the institution's 21 sexual abuse investigation files from the previous 12 months during the onsite phase of the audit. The auditor was unable to

identify any allegations submitted by an incarcerated individual by grievance. As there were none, the auditor was unable to assess the requirements of this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.52(e). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Third parties, including fellow inmates, staff members, family members, attorneys and outside advocates shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates. If a third party files such a request on behalf of any inmate, the facility has the right to 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. If the inmate declines to have the request processed on his/her behalf, the Detention Center Inspector shall document the inmate's decision." In the PAQ, the facility indicated there were no such grievances submitted during the 12 months prior to the onsite audit.

The auditor reviewed the institution's 21 sexual abuse investigation files from the previous 12 months during the onsite phase of the audit. The auditor was unable to identify any allegations submitted by an incarcerated individual by grievance. As there were none, the auditor was unable to assess the requirements of this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.52(f). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "When a grievance is received and implies that an inmate is at substantial risk of imminent sexual abuse the supervisor who receives the grievance shall provide immediate corrective action and start an investigation within 12 hours from the receipt of the grievance and notify the Detention Center Inspector. The Detention Center shall issue a final agency decision within 3 calendar days. The initial response and final decision documents the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance. The agency will notify the inmate in writing if an extension is needed and provide a date by which a decision will be made. The extension shall never exceed the PREA limitations of 48 hours response and 5 calendar days for the agency's final decision." In the PAQ, the facility indicated there were no such grievances submitted during the 12 months prior to the onsite audit.

The auditor reviewed the institution's 21 sexual abuse investigation files from the previous 12 months during the onsite phase of the audit. The auditor was unable to identify any allegations submitted by an incarcerated individual by grievance. As there were none, the auditor was unable to assess the requirements of this provision. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.52(g). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The agency shall discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency

	<p>demonstrates that the inmate filed the grievance in bad faith.”</p> <p>The auditor reviewed the institution’s 21 sexual abuse investigation files from the previous 12 months during the onsite phase of the audit. The auditor noted no discipline for incarcerated individuals for filing allegations that are found to be unfounded. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.53	Inmate access to outside confidential support services
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	Auditor Overall Determination: Meets Standard
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	Auditor Discussion
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	The following evidence was analyzed in making the compliance determination:
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1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault*
 3. *PREA Pamphlet - End the Silence*
2. Interviews:
 1. Specialized staff
 2. Random incarcerated individuals
 3. Targeted incarcerated individuals
3. Site Review Observations:
 1. Housing units
 2. Kiosks

Findings (by provision):

115.53(a). The facility provided information from *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The Hernando County Detention Center provides inmates access to an outside victim advocate where they can receive emotional support services related to sexual abuse. The mailing address for the Dawn Center of Hernando County is P.O. Box 6179 Spring Hill, FL 34611. In addition, there are two telephone numbers for the Hernando County Dawn Center (Office: 352- 686-8759; Hotline: 352-686-8430), these numbers are also posted throughout the facility and in each housing unit. In regards to persons detained solely for immigration purposes, immigrant service agency telephone numbers are available on the Mail Guard kiosk. The facility shall enable reasonable communication between inmates and these organizations and maintain confidentiality in all possible manners.” In the PAQ, the facility also provided the *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault (MOU)*. The parties of the MOU are the Hernando County Sheriff’s Office and

the Dawn Center of Hernando County. The Dawn Center is a nonprofit rape crisis center, certified by the Florida Council Against Sexual Violence. This MOU clearly identifies that the Dawn Center will provide emotional support services for those incarcerated individuals that may need it. It provides the opportunity for incarcerated individuals to either write to or call advocates at the center and receive a written response or talk directly with an advocate. The MOU discusses the limitations on confidentiality and the requirements to notify the facility regarding safety and indications of self-harm or if the incarcerated individual is attempting to file an allegation rather than seeking support services.

During the onsite phase of the audit, the auditor interviewed 18 random incarcerated individuals. Most of 18 incarcerated individuals were able to explain to the auditor what the emotional support services were and how to obtain those services. They knew that it was posted on the signs in the housing unit and in the other material provided at intake. The auditor also interviewed two (2) incarcerated individuals who had reported prior sexual abuse during the risk screening. Both incarcerated individuals were aware of the available support services, as it was posted on the signs in the housing unit. Neither of them needed to use the services, but they knew they could either call or write to them. During the site review, the auditor located the zero tolerance signs in each of the housing units. At the bottom of each of the signs, emotional support services were clearly outlined for all incarcerated individuals to see. The signs explain the service, the mailing address, and the phone number in an easy-to-read manner. Several incarcerated individuals were able to show the auditor the same information on the kiosk in the housing unit, where it was explained the limitations regarding privacy and confidentiality. This information was also found in the *PREA Pamphlet*. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.53(b). The facility provided information from *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "The Detention Center shall inform inmates of the extent to which such communications shall be monitored and to the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws prior to giving the inmates access."

The MOU with the Dawn Center discusses the limitations on confidentiality and the requirements to notify the facility regarding safety and indications of self-harm or if the incarcerated individual is attempting to file an allegation rather than seeking support services. These limitations are also listed in the Inmate Rules.

During the onsite phase of the audit, the auditor interviewed 18 random incarcerated individuals. Most of 18 incarcerated individuals were able to explain to the auditor what the emotional support services were and how to obtain those services. They knew that it was posted on the signs in the housing unit and in the other material provided at intake. The auditor also interviewed two (2) incarcerated individuals who had reported prior sexual abuse during the risk screening. Both incarcerated individuals were aware of the available support services, as it was posted on the signs in the housing unit. Neither of them needed to use the services, but they knew they could either call or write to them. During the site review, the auditor located the zero tolerance signs in each of the housing units. At the bottom of each of the signs,

emotional support services were clearly outlined for all incarcerated individuals to see. The signs explain the service, the mailing address, and the phone number in an easy-to-read manner. Several incarcerated individuals were able to show the auditor the same information on the kiosk in the housing unit, where it was explained the limitations regarding privacy and confidentiality. This information was also found in the *PREA Pamphlet*. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.53(c). The facility provided information from *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The Hernando County Sheriff’s Office Detention Center has entered into a Memorandum of Understanding (MOU) with the Dawn Center of Hernando County, a community service provider, that is able to provide inmates with confidential emotional support services related to sexual abuse. The Hernando County Detention Center maintains copies of agreements or documentation showing attempts to enter into such agreements.” The facility provided the auditor with the *Memorandum of Understanding for Services for Incarcerated Survivors of Sexual Assault (MOU)*.

During the onsite phase of the audit, the auditor contacted the director at the Dawn Center. The auditor asked several questions regarding the MOU and the expectations for staff at the Center to provide services for incarcerated individuals in the facility. The auditor was told that the Center and the HCDC work very well together and there is open communication regarding the incarcerated population’s needs. The MOU had been in place for several years and has been renewed annually several times. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Hernando County Sheriff’s Office Website <p>Findings (by provision):</p> <p>115.54(a). The facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, “Information on how to report sexual abuse and sexual harassment to the PREA hotline on behalf of an inmate is provided on the Hernando County Detention Center website.” Zero tolerance signs posted throughout the facility inform incarcerated individuals that a third party may</p>

	<p>file an allegation of sexual abuse on their behalf. There are also signs in the facility lobby for members of the public to see as well as those people coming to the facility for visitation.</p> <p>The auditor reviewed the Hernando County Sheriff’s Office web page, and under the page heading for Detention, there is a link for PREA. This page lists the agency’s zero-tolerance information and directs the public to call the PREA hotline, contact the PREA Coordinator, or contact the Sheriff’s Office to report incidents of sexual abuse or sexual harassment, if needed. The agency’s PREA policy is also posted. The information can be found here: PREA Information (hernandosheriff.org). Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Random staff <p>Findings (by provision):</p> <p>115.61(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. This policy states, “All staff shall report immediately to a supervisor 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. Retaliation against inmates or staff who reported such an incident and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.”</p> <p>During the onsite phase of the audit, the auditor interviewed 12 random staff members. Every person interviewed clearly stated that they were required to immediately report all allegations of sexual assault or sexual harassment, regardless of the type of allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.61(b). <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> was provided to the auditor in the PAQ. The policy states, “Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a</p>

sexual abuse report to anyone other than to the extent necessary, as specified in the Detention Center policy, to make treatment, investigation, and other security and management decisions.”

Random staff interviewed clearly understood the requirement to maintain confidentiality of sexual assault and sexual harassment cases. Each of the 12 random staff members interviewed reported that they were only allowed to discuss these cases with people who needed to know the information for official business. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.61(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, “Unless otherwise precluded by Federal, State or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (3) of this section and to inform inmates of the practitioner’s duty to report and the limitations of confidentiality at the initiation of services.” The State of Florida requires mandatory reporting of incidents of sexual abuse of an incarcerated individual under Florida State Statute 944.35(3)(d). This law does not provide an exception for medical and mental health practitioners and all staff members of the jail are required to immediately report all incidents.

During the onsite phase of the audit, the auditor interviewed three staff members from the medical department, the health care administrator, a nurse, and a mental health counselor. All three confirmed that they are mandatory reporters of sexual abuse of incarcerated individuals. Staff did confirm that they would inform the incarcerated individual of their duty to report and limits to the confidentiality of information learned from the incarcerated individual. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.61(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, “If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person statute, the Detention Center shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.” In the State of Florida, staff are required to report allegations of sexual abuse of a person under the age of 18 to the Florida Department of Children and Families (DCF).

The auditor interviewed the Major, the jail administrator, and the PREA coordinator. They both confirmed that DCF would immediately be notified of any allegation of sexual abuse of a youthful offender housed in the facility. The auditor was told the detective investigating the allegation would make the notification, as he would for any person under the age of 18 in the community. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.61(e). In the PAQ, *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* states, “The Hernando County Detention Center shall report all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, to the facility’s designated investigator.”

The auditor interviewed the Major, the jail administrator, who confirmed that the

	<p>facility investigates all allegations of sexual abuse and sexual harassment. All allegations are forwarded to the Detention Inspector. The investigation may be assigned to a detective on the law enforcement side if the allegation is filed against a staff member. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.62	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Random staff <p>Findings (by provision):</p> <p>115.62(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states “When the Detention Center learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.” In the PAQ, the facility noted there were no such notifications that an individual was at a substantial risk of imminent sexual abuse.</p> <p>The auditor interviewed the PREA coordinator and the Major, the jail administrator, during the onsite phase of the audit. They made it clear that all staff members are directed to immediately take action to protect any incarcerated individual if they become aware that he or she is in imminent danger of being abused. The auditor interviewed 12 random staff members. All stated that they always react immediately if they see someone in imminent danger. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

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

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
2. Interviews:
 1. Agency head
 2. Specialized staff

Findings (by provision):

115.63(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Jail Administrator or designee shall notify the head of the facility or appropriate office of the agency where the alleged abuse had occurred within 72 hours. The Jail Administrator or designee shall then document the incident in a report including who the incident was reported to at the offending facility." In the PAQ, the facility stated that there were no such notifications in the previous 12 months prior to the audit.

115.63(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Jail Administrator or designee shall notify the head of the facility or appropriate office of the agency where the alleged abuse had occurred within 72 hours. The Jail Administrator or designee shall then document the incident in a report including who the incident was reported to at the offending facility."

115.63(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Jail Administrator or designee shall notify the head of the facility or appropriate office of the agency where the alleged abuse had occurred within 72 hours. The Jail Administrator or designee shall then document the incident in a report including who the incident was reported to at the offending facility."

The auditor was unable to verify such notifications, as there were none during the previous 12 months prior to the PREA audit. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.63(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*, provided to the auditor in the PAQ, states, "The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards." In the PAQ, the facility stated that there was one (1) such notification from another agency in the previous 12 months prior to the audit.

During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator. Asked about the next steps if he received an allegation from another

	<p>facility, he stated clearly that it would be immediately forwarded to the PREA coordinator to begin an investigation. The auditor reviewed one email communication received from a federal prison where an incarcerated individual filed an allegation stating he had been the victim of sexual abuse while incarcerated in the HCDC. The sexual abuse investigation file related to this outside allegation was reviewed by the auditor. The allegation was investigated properly just as the agency would for every other reported allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Targeted incarcerated individuals 2. Specialized staff 3. Random staff <p>Findings (by provision):</p> <p>115.64(a). The facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, “When staff becomes aware of an allegation that an inmate was sexually abused they will proceed with the following directions: Immediately separate the alleged victim, abuser, and any witnesses; Attempt to identify the location where the alleged crime took place, secure and preserve the crime scene, and gather all other pertinent information; If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and ensure 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, until cleared by the Hernando County Detention Center Inspector/or designee.” In the PAQ, the facility indicated that there were eight (8) allegations of sexual abuse reported where the first responder took the appropriate actions. There were no cases that were reported within a time frame that would allow for the collection of evidence.</p> <p>The auditor interviewed 12 random staff members during the onsite phase of the audit. Each person interviewed easily provided the auditor with these initial first responder steps. The auditor interviewed one staff member who was a first</p>

responder to an allegation of abuse. He confirmed that the required steps were taken to protect the crime scene, separate the two incarcerated individuals and preserve physical evidence. The auditor also interviewed two (2) incarcerated individuals who had filed an allegation of sexual abuse. Both incarcerated individuals recalled being separated from all incarcerated individuals in the housing unit and being asked to avoid doing things to destroy potential evidence. The auditor reviewed the sexual abuse investigation file from their allegations and was able to confirm documentation of the steps taken following the incarcerated individual's allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.64(b). In the PAQ, the auditor reviewed *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Any civilian staff member who is notified of sexual abuse or sexual harassment will request that the alleged victim not take any action that could destroy physical evidence and then notify the shift supervisor." In the PAQ, the facility indicated that there were no allegations of sexual abuse reported where the first responder was a non-security staff member.

During the onsite phase of the audit, the auditor talked with several staff members during the site review. Every individual easily recited these initial steps to take as a first responder, including non-security staff members. The auditor interviewed 12 random staff members and all staff knew the first response steps to ensure safety for incarcerated individuals and proper investigations. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Interviews: <ol style="list-style-type: none"> 1. Agency head <p>Findings (by provision):</p> <p>115.65(a). The facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, "This policy shall stand as the written facility plan to coordinate actions taken in response to an incident of sexual abuse, among members to include first responders, medical and mental health practitioners, investigators and facility leadership." The policy also notes this standard in <i>Section I - Staff Response to Allegations</i>. This section identifies the steps</p>

	<p>a first responder is to take when they first become aware of an allegation of sexual abuse of an incarcerated individual. The steps include the preservation of physical evidence, notification of supervisors, notification of medical staff, notification and activation of the Detention Inspector, and activation of retaliation monitoring.</p> <p>During the onsite phase of the audit, the auditor reviewed the steps of the coordinated response plan with the Major, the jail administrator, and the PREA coordinator. It was confirmed that all areas of the facility work together in response to any incident, including sexual abuse allegations. The PREA coordinator stated that the coordinated response plan is referenced for any response to a sexual abuse allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ul style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ul style="list-style-type: none"> 1. None 2. Interviews: <ul style="list-style-type: none"> 1. Agency head <p>Findings (by provision):</p> <p>115.66(a). The Hernando County Detention Center does not participate in collective bargaining with their staff. It was confirmed through an interview with the Major, the jail administrator, during the onsite portion of the audit that there was no collective bargaining agreement in place for staff. The auditor did confirm, however, that the agency would allow for the PREA provision if the agency moved toward a collective bargaining agreement for staff in the future. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.66(b). The auditor is not required to audit this provision.</p>

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

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. Sexual Abuse Investigation files
2. Interviews:
 1. Targeted incarcerated individuals
 2. Agency head
 3. Specialized staff

Findings (by provision):

115.67(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Sexual abuse and sexual harassment victims, witness, and perpetrators shall be free from retaliation. The Hernando County Detention Center shall protect all inmates and staff who report sexual abuse or sexual harassment from retaliation by other inmates or staff." The Detention Inspector is the individual who is charged with monitoring individuals for potential retaliation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.67(b). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "The Detention Center offers 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 cooperation with investigations."

Through interviews with the Detention Inspector, the auditor was able to confirm the use of these measures to protect incarcerated individuals and staff from retaliation. The auditor interviewed the Major, the jail administrator, who stated that they would take advantage of every opportunity to protect reporters of abuse from potential retaliation. The auditor also interviewed two (2) incarcerated individuals who had filed an allegation of sexual abuse. Both incarcerated individuals were able to recall being asked about retaliation after the initial investigation. They reported no issues with retaliation. The auditor reviewed the sexual abuse investigation file related to their allegation during the onsite audit and located the retaliation monitoring records. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.67(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* states, "For at least 90 days following a report of sexual abuse, the Detention Center shall monitor the conduct and treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest retaliation by inmates or staff, and shall act promptly to remedy any such retaliation. The following may be used to monitor and assess retaliation: Disciplinary reports, Housing or program changes, Verbal conversations. If deemed appropriate, the Detention Center Inspector shall continue to monitor beyond

90 days.” The facility indicated there were no incidents of reported retaliation during the 12 months prior to the onsite audit.

During the onsite phase of the audit, the auditor interviewed the Detention Inspector, who stated that he meets with incarcerated individuals as needed to verify there are no concerns. He could not recall a time when an incarcerated individual expressed a concern regarding retaliation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.67(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* states, “Inmate monitoring shall also include periodic status checks through review of the video monitoring system and unannounced rounds made by corporals and higher level supervisors. The inmate is also placed on the PREA Retaliation Monitoring Special Status in Guardian RFID. This is to ensure that any staff member who has scanned the inmate’s ID will have knowledge that they are on the retaliation monitoring watch list.”

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. The Inspector confirmed periodic checks of incarcerated individuals to verify their safety and well-being. These checks are documented and placed in the incarcerated individual’s investigations file. The auditor was told about the Guardian RFID incarcerated individual tracking system. All individuals that are involved as part of a sexual abuse or sexual harassment investigation are logged into the system for retaliation monitoring. This provides each deputy with an indicator the individual is being monitored. This additional monitoring is over and above any monitoring required by this provision. The auditor also interviewed two (2) incarcerated individuals who had filed an allegation of sexual abuse. Both incarcerated individuals were able to recall being asked about retaliation after the initial investigation. They reported no issues with retaliation. The auditor reviewed the sexual abuse investigation file related to their allegation during the onsite audit and located the retaliation monitoring records and the periodic checks by the retaliation monitor. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.67(e). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* states, “The Detention Center shall take appropriate measures to protect any other individual who cooperates with an investigation and expresses a fear of retaliation.”

During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator. He confirmed that the facility would take immediate action against any incarcerated individual or staff member if it was proven they had retaliated against another person due to their participation in sexual abuse investigations. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.67(f). The auditor is not required to audit this provision.

The agency’s use of the Guardian RFID system to provide all incarcerated individuals additional, everyday monitoring for their safety and protection from retaliation is exceptional. It clearly goes above what is required by the provisions of this standard. That additional monitoring, that is instantaneous, provides monitoring above the

	<p>periodic checks that are required. Any indicator of potential retaliation would be noted immediately and can be addressed quickly to ensure the individual is safe. This monitoring and the work performed by the Detention Inspector clearly exceeds the standard.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Random staff 3. Targeted incarcerated individuals 3. Site Review Observations: <ol style="list-style-type: none"> 1. Segregated housing <p>Findings (by provision):</p> <p>115.68(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Any use of segregated housing to protect an inmate who is alleged to have suffered from sexual abuse is subject to the requirements of 115.43 and Standing Operating Procedure 7095.01 - <i>Segregation Housing.</i>”</p> <p>During the onsite review, the auditor interviewed several people to review this standard. The PREA coordinator confirmed the availability of administrative confinement that can be utilized to keep an individual safe following the filing of an allegation of sexual abuse. The auditor interviewed two (2) incarcerated individuals that had filed an allegation of sexual abuse. Both were currently housed in general population and, although placed in administrative confinement briefly following the filing of the allegation, they have been housed in general population since then. Both told the auditor they were safe in population and did not feel the need to request segregation or confinement. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard

Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. Sexual Abuse Investigation files
 3. Grievance records
2. Interviews:
 1. Specialized staff

Findings (by provision):

115.71(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Hernando County Detention Center conducts its own investigations into allegations of sexual abuse and sexual harassment, promptly, thoroughly and objectively for all allegations including third party and anonymous reports."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. The Inspector was clear that he would respond immediately upon notification of an allegation of sexual abuse. If needed, the facility staff can contact an on-call detective, who would respond immediately to the facility and evaluate the victim and the allegations. The Inspector stated that investigations are well documented, objective, and timely. The PREA coordinator confirmed the Detention Inspector is contacted for all incidents that involve physical contact between incarcerated individuals or for physical contact between a staff member and an incarcerated individual. The auditor reviewed the facility's grievances submitted during the previous 12 months. Also reviewed were the facility's 21 sexual abuse investigation files from the previous 12 months. The auditor confirmed through this review that all allegations were investigated beginning on the day of notification of the allegation of sexual abuse. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(b). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided in the PAQ. The policy states, "The Hernando County Detention Center is responsible for investigating all allegations of sexual abuse or sexual harassment." The auditor had previously reviewed the written documentation submitted for standard 115.34, which references the requirements for specialized investigation training. The auditor was provided with written proof of completed training for the Detention Inspector.

During the onsite phase of the audit, the auditor met with the Detention Inspector. He confirmed that he had completed the specialized training class for investigations. This training focused on the need to understand the difficulties for a victim in a correctional facility and the techniques that can be employed to thoroughly investigate and gather information. Based on this analysis, the auditor finds the

facility in compliance with this provision.

115.71(c). In the PAQ, *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor. The policy states, "Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. The Inspector/or designee shall interview alleged victims, suspected perpetrators and witnesses. The Inspector/ or designee shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. He explained that every investigation inside the facility is treated like an investigation outside the facility, where each investigation would include everything expected in this provision of the standard. He explained that a review of facility video evidence, telephone calls, and available DNA evidence would be a standard part of every sexual abuse investigation. He stated that if the allegation presented information that indicated evidence could be collected from the alleged victim by way of a forensic medical examination, the current protocol is to have the incarcerated individual victim transported to the Dawn Center, where a SANE nurse would perform the examination. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(d). In the PAQ, *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor. The policy states, "When the quality of evidence appears to support criminal prosecution the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution."

During the auditor's interview with the Detention Inspector, the auditor talked with the Inspector about coordinating investigative efforts with the professional standards unit if an investigation involves a staff member. He confirmed that this is something already done when investigating allegations from the public for road patrol deputies. The agency's standard practice is to suspend administrative investigations while the criminal investigation is completed. If it is needed, professional standards will not conduct compelled interviews from staff until the completion of the criminal investigation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(e). The agency provided a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, "The credibility of an alleged victim, suspect or witness shall be assessed based on an individual basis and shall not be determined by the person's status as inmate or staff. Furthermore, no agency shall require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation of such allegation."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. He explained to the auditor that the agency would never utilize truth-telling efforts to determine if any victim of sexual abuse was telling the truth. That is something that

is forbidden and would never be done by any investigator. He also confirmed that the agency would always review evidence from their investigation on its own and not allow the incarcerated individual victim's status as an incarcerated individual to affect the outcome of the investigation. The auditor interviewed two (2) incarcerated individuals who had reported sexual abuse. Both incarcerated individuals confirmed that they were not asked or required to submit to a polygraph examination. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(f). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "All administrative investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings and shall include an effort to determine whether staff actions or failures to act contributed to the abuse."

The auditor interviewed the Detention Inspector during the onsite phase of the audit. The Inspector told the auditor that one major part of all such investigations includes a review to determine if there were any violations of policy and violations of law. He confirmed that he is required to write a report at the completion of all investigations. The report will include the allegation, evidence collected and reviewed, summary of interviews, and the reasoning behind his final determination. If there was a finding that a staff member's failure to act or some other actions contributed to the sexual abuse in some way, that would be noted in the report and forwarded to facility administration. He stated that all substantiated allegations would be referred for criminal prosecution.

The auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months. The auditor reviewed the investigation files and noted the review of the staff members' actions or inactions in each of the incidents. The investigation reports included a description of the incarcerated individual interviews, staff interviews, and physical evidence and how the investigator made the decision on his findings. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(g). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible."

The Detention Inspector was interviewed by the auditor, and he confirmed that he is required to write a report at the completion of all investigations. The report will include the allegation, evidence collected and reviewed, summary of interviews and the reasoning behind his final determination. The auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months. Each of the files contained a final report and evaluation of evidence, interviews, and final determination. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(h). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was included in the PAQ. The policy states, “Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.” In the PAQ, HCDC indicated there was one (1) substantiated allegation that was referred for prosecution during the previous 12 months prior to the audit.

The Detention Inspector was interviewed by the auditor, and he confirmed that all substantiated allegations of sexual abuse would be referred for potential prosecution to the State Attorney’s Office. The Inspector stated that there was one (1) substantiated case of sexual abuse against an incarcerated individual, where he did file a criminal charge against the abuser. The charge was battery on an incarcerated individual, but there was no sexual component. The auditor interviewed the PREA coordinator. He agreed that the agency would refer all substantiated cases for prosecution, as the PREA standards required it, and it would also assist the agency in continuing education for incarcerated individuals. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(i). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was included in the PAQ for the auditor’s review. The policy states, “The agency shall retain all written reports for as long as the alleged abuser is incarcerated in the facility or employed by the agency, plus five years.”

The PREA coordinator confirmed that the facility maintains their sexual abuse investigation files for at least ten years and explained to the auditor that all the files are secured in the Inspector’s office. They have files as far back as 2012. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(j). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was included in the PAQ and states, “The departure of the alleged aggressor or victim from the employment or control of the facility shall not provide a basis for terminating an investigation.”

The auditor interviewed the Detention Inspector during the onsite phase of the audit. The Inspector stated that once an investigation was opened, the agency would continue with that investigation even if the alleged abuser or victim is no longer employed or housed in the facility. The Inspector stated clearly that this is their normal procedure for any investigation, regardless of where it occurred. The PREA coordinator stated that the facility would continue with the investigation and prosecute, when possible, even if the individual was no longer employed or had been released from the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.71(k). The auditor is not required to audit this provision.

115.71(l). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was included in the PAQ and states, “When outside agencies investigate sexual abuse, the Hernando County Detention Center shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.”

The agency does not employ outside agencies to perform their criminal or

	<p>administrative investigations. They are completed internally. The auditor completed several interviews related to this standard. The Detention Inspector stated that if an outside agency were investigating something related to sexual abuse, or any crime, in the facility, they would cooperate with the investigation. He stated that they would also maintain communication and stay informed. The auditor interviewed the PREA coordinator, and he stated that they would communicate with any outside agency investigating sexual abuse complaints in the facility. This would ensure the outside agency receives cooperation to assist in the investigation and will keep open lines of communication regarding the outcome. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff <p>Findings (by provision):</p> <p>115.72(a). The facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, “The agency shall impose no standard higher than the preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.”</p> <p>The auditor interviewed the Detention Inspector during the onsite phase of the investigation. The Inspector confirmed that the preponderance of evidence is the standard utilized for all sexual abuse and sexual harassment investigations in the facility. The auditor reviewed the facility’s 21 sexual abuse investigation files from the previous 12 months and determined that the facility uses this standard for all investigations. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard

Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. Sexual Abuse Investigation files
 3. *PREA Notification of Investigation Findings*
2. Interviews:
 1. Specialized staff
 2. Targeted incarcerated individuals

Findings (by provision):

115.73(a). In the PAQ, the auditor was provided a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Following an investigation into an inmate's allegation that he or she has suffered sexual abuse in the Detention Center, the Detention Center shall inform the inmate as to whether the allegation has been substantiated, unsubstantiated or unfounded."

During the onsite phase of the audit, the auditor interviewed several staff members in reference to this standard. The Major, the jail administrator, agreed that this is standard procedure. The Detention Inspector stated he completes the notification form and delivers it to the incarcerated individual after the final investigative report is provided to the PREA coordinator. The PREA coordinator stated that they would always notify the incarcerated individual as the policy states. The auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months and was able to easily locate the written notification of the investigative findings to the incarcerated individual in all files where the outcome was not unfounded. The notification is provided to the incarcerated individual on the *PREA Notification of Investigation Findings* form. The auditor was able to interview two (2) incarcerated individuals who had filed an allegation of sexual abuse during his incarceration. One stated that he received notification of the outcome of the investigation. The other stated he did not receive the notification. The auditor verified the outcome of that investigation was unfounded, so no notification was required. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.73(b). This provision does not apply, as the facility performs their own investigations of sexual abuse and sexual harassment allegations. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.73(c). The auditor was provided information from *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ for this provision. The policy states, "Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate, unless the allegation is unfounded, whenever: a. The staff member is no longer posted within the inmate's unit. b. The staff member is no longer employed at the facility. c. The

agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility. d. The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.”

During the onsite phase of the audit, the auditor interviewed two (2) incarcerated individuals who had filed an allegation of sexual abuse against another incarcerated individual. One stated that he received notification of the outcome of the investigation. The other stated he did not receive the notification. The auditor verified the outcome of that investigation was unfounded, so no notification was required. In both cases, the allegation was against another incarcerated individual, so they would not have received any notifications regarding a staff member as required in this provision. The auditor was unable to review any additional information regarding this provision through interviews with staff and incarcerated individuals, as there have been no substantiated allegations against a staff member in the 12 months prior to the audit. There were no notations in any of the investigation files regarding separation of an incarcerated individual from an alleged staff member abuser, as it was not required. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.73(d). The auditor was provided information from *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ for this provision. The policy states, “Following an inmate’s allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever: a. The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility. b. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.”

During the onsite phase of the audit, the auditor interviewed two (2) incarcerated individuals who had filed an allegation of sexual abuse against another incarcerated individual. One stated that he received notification of the outcome of the investigation. The other stated he did not receive the notification. The auditor verified the outcome of that investigation was unfounded, so no notification was required. Neither individual was able to answer additional questions related to this provision since the outcome of the investigation was not substantiated and, therefore, no charges were filed against the incarcerated individual abuser. In the one file that was substantiated, a battery on another incarcerated individual charge was filed, but further review found the State Attorney’s Office declined to file a charge and prosecute the case. Therefore, no additional notification to the incarcerated individual victim was required. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.73(e). In the PAQ, the auditor was provided a copy of *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “All such notifications or attempted notifications are documented by the PREA Inspector in the PREA Investigation Packet and investigative report.”

During the onsite phase of the audit, the auditor reviewed the facility’s 21 sexual abuse investigation files from the previous 12 months. Although the auditor easily

	<p>located the <i>PREA Notification of Investigation Findings</i> form utilized to notify incarcerated individuals of the outcome of the investigation, there were no additional notifications made, so the auditor was unable to verify this part of the provision. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.73(f). The auditor is not required to audit this provision.</p>
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115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized interviews <p>Findings (by provision):</p> <p>115.76(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.”</p> <p>The auditor reviewed the facility’s 21 sexual abuse investigation files for the previous 12 months. There were no substantiated allegations against a staff member for either sexual misconduct or sexual harassment. Therefore, the facility was unable to provide any additional documentation related to this provision. The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last two years. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.76(b). <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> was provided in the PAQ. The policy states, “Termination shall be the presumptive disciplinary sanction for staff who engages in sexual abuse.”</p> <p>The auditor reviewed the facility’s 21 sexual abuse investigation files for the previous 12 months. There were no substantiated allegations against a staff member for either sexual misconduct or sexual harassment. Therefore, the facility was unable to provide any additional documentation related to this provision. The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last two years. Based on this</p>

analysis, the auditor finds the facility in compliance with this provision.

115.76(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided in the PAQ. The policy states, “Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.”

The auditor reviewed the facility’s 21 sexual abuse investigation files for the previous 12 months. There were no substantiated allegations against a staff member for either sexual misconduct or sexual harassment. Therefore, the facility was unable to provide any additional documentation related to this provision. The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last two years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.76(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided in the PAQ. The policy states, “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, shall be reported to law enforcement agencies, unless the act was clearly not criminal and to any relevant licensing bodies.”

The auditor reviewed the facility’s 21 sexual abuse investigation files for the previous 12 months. There were no substantiated allegations against a staff member for either sexual misconduct or sexual harassment. Therefore, the facility was unable to provide any additional documentation related to this provision. The auditor confirmed through conversations with the PREA coordinator that there have been no substantiated incidents of staff sexual abuse over the last two years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none">1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)<ol style="list-style-type: none">1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>2. Sexual Abuse Investigation files2. Interviews:<ol style="list-style-type: none">1. PREA coordinator

2. Specialized staff

Findings (by provision):

115.77(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies and relevant licensing bodies, unless the act was clearly not criminal."

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He confirmed that there have been no cases of misconduct by a volunteer or contractor during the previous 12 months. The auditor reviewed the facility's 21 sexual abuse investigation files for the previous 12 months and did not find any allegations made against a volunteer or contractor. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.77(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "In the case of any other violation of the Detention Center's sexual abuse and sexual harassment policies by a contractor or volunteer, the Detention Center will take appropriate remedial measures and considers whether to prohibit further contact with inmates."

The auditor interviewed the PREA coordinator during the onsite phase of the audit and learned that the agency will automatically remove a volunteer or contractor involved in sexual abuse from incarcerated individual contact. The auditor also interviewed the Major, the jail administrator, who stated that the agency would take swift action to remove any volunteer or contractor from incarcerated individual contact and immediately restrict access to the secure facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ul style="list-style-type: none">1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)<ul style="list-style-type: none">1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>2. Sexual Abuse Investigation files2. Interviews:<ul style="list-style-type: none">1. Specialized staff

Findings (by provision):

115.78(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in an inmate on inmate sexual abuse or following a criminal finding of guilt for inmate on inmate sexual abuse." In the PAQ, the facility stated there was one (1) case where the incarcerated individual was found responsible for an allegation of sexual abuse against another individual and, therefore, disciplined internally.

During the onsite phase of the audit, the auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months. There was one (1) substantiated allegation of incarcerated individual vs. incarcerated individual sexual abuse that led to an administrative disciplinary sanction for the incarcerated individual abuser. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(b). In the PAQ, the auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories."

During the onsite phase of the audit, the auditor confirmed through interviews with the PREA coordinator and the Major, the facility administrator, that administrative sentences for incarcerated individuals are based on the policy, the nature of the incident, incarcerated individual history, and prior sanctions imposed for similar offenses. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* states, "The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."

The PREA coordinator and the Major, the facility administrator, confirmed that the facility would consider the incarcerated individual's mental illness or mental disabilities before imposing any sanctions for sexual abuse or sexual harassment. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(d). During the onsite phase of the audit, the auditor interviewed the health care administrator and a mental health counselor. Both stated the facility does not offer counseling or mental health therapy for incarcerated individuals with mental health disorders that would include programs specific to those who commit sexual abuse. This type of therapy is not feasible in a county jail setting, as the population is transient and not cost effective. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(e). HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) was provided in the PAQ. The policy states, “The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.”

The PREA coordinator was interviewed and stated that there have been no such incidents of sexual contact between staff and incarcerated individuals. The auditor reviewed the facility’s 21 sexual abuse investigation files from the previous 12 months, and there are no cases where the staff member did not consent to physical contact with an incarcerated individual. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(f). HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) was provided in the PAQ. The policy states, “For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident even if an investigation does not establish evidence sufficient to substantiate the allegation.”

The auditor reviewed the facility’s 21 sexual abuse investigation files during the onsite phase of the audit. The auditor did not find any incidents of incarcerated individual discipline due to the finding of false allegations. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.78(g). HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA) was provided in the PAQ. The policy states, “The Detention Center prohibits all sexual activity between inmates and may discipline inmates for such activity. The Detention Center does not, however, deem such activity to constitute sexual abuse if it is determined that the activity is not coerced.”

The auditor did note an incarcerated individual rule that prohibits sexual contact listed in the HCDC *Inmate Handbook*. Such an offense, however, is not considered sexual abuse or sexual battery if the investigation determines the sexual contact between two incarcerated individuals is determined to be consensual. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)

2. Interviews:
 1. Specialized staff
 2. Targeted incarcerated individuals
3. Site Review Observations:
 1. Computer systems
 2. Medical services

Findings (by provision):

115.81(a). The Hernando County Detention Center is a county jail facility, and this provision does not apply. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.81(b). The Hernando County Detention Center is a county jail facility, and this provision does not apply. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.81(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "As stated in section V.B.6 of this policy, all inmates who have disclosed prior sexual victimization or sexual abusiveness history, whether it occurred in an institutional setting or in the community, are referred to a mental health staff within 14 days of the intake screening."

During the onsite phase of the audit, the auditor interviewed the classification supervisor, who, along with his staff, conducts the risk screening. He confirmed that incarcerated individuals are asked questions regarding prior sexual victimization, and whether it occurred in another correctional setting or in the community. The auditor interviewed two (2) incarcerated individuals who reported prior sexual victimization on the risk screening. Both incarcerated individuals confirmed to the auditor that they were seen by medical within the first week in the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.81(d). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical/mental health staff, Classification Unit and administration as necessary, to determine treatment plans and security and management decisions, including housing, bed, work, education, and program assignments or as otherwise required by Federal, State or local law."

During the onsite phase of the audit, the auditor talked with several staff members while performing the site review. Staff members were asked about the screening of incarcerated individuals and how to access the screening information in the computer. The auditor was told they were unable to access that information in the computer. The auditor asked three deputies to access the computer and show him the screening information and they were unable to do so. The auditor was assured by the PREA coordinator that access to the screening tool's data was restricted to staff

	<p>that required access to the information, such as classification, the Inspector, and the PREA Coordinator. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.81(e). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Medical/mental health staff shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under 18.”</p> <p>During the onsite phase of the audit, the auditor interviewed the health care administrator, a nurse, and a mental health counselor. All three stated that all medical staff obtain informed consent from incarcerated individuals. They all understand the requirement to disclose to incarcerated individuals the needs of the facility and the reasoning behind such disclosures. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals <p>Findings (by provision):</p> <p>115.82(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are to be determined by medical and mental health practitioners according to their professional judgment.”</p> <p>During the onsite phase of the audit, the auditor interviewed the health care administrator, a nurse, and a mental health counselor. All three confirmed that all appropriate services would be provided to all sexual abuse victims. Other than any emergent medical care, if the Detention Inspector or another detective determines the incarcerated individual victim should have a forensic medical examination</p>

performed, the victim would be transported to the Dawn Center for the examination. Upon return to the facility, the nurse and the contract physician would coordinate follow-up care with the recommended treatment plan provided by the Center. The auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months. Each record included a notation that the incarcerated individual victim was seen by medical and cleared of any potential injury. Notes also show a referral to the mental health counselor. The auditor interviewed two (2) incarcerated individuals who had reported an allegation of sexual abuse. They told the auditor that they were seen immediately by a nurse after reporting the allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.82(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Medical staff is on duty at the facility 24 hours a day. Detention Center's first responders shall take the preliminary steps to protect victims of abuse in accordance to 115.62, and shall immediately notify the appropriate medical and/or mental health staff."

The auditor interviewed the health care administrator, a nurse, and a mental health counselor, during the onsite phase of the audit. All three confirmed that staff are on duty 24 hours a day. A nurse is always available, and the contracted physician is also available by telephone after hours. If a sexual assault were to take place after hours, the staff on duty would make an immediate evaluation and call emergency medical services for transport to a hospital if the situation warranted and the nurse on duty was unable to provide treatment. The auditor also interviewed staff members who were asked about the steps to take upon discovering or learning of a sexual assault of an incarcerated individual. Each staff member confirmed that the incarcerated individual would be evaluated by medical as soon as possible. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.82(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Inmate victims of sexual abuse while incarcerated shall be offered timely information and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate."

During the onsite phase of the audit, the auditor interviewed the health care administrator, a nurse, and a mental health counselor. All three confirmed that all appropriate services would be provided to all sexual abuse victims. Other than any emergent medical care, if the Detention Inspector or another detective determines the incarcerated individual victim should have a forensic medical examination performed, the victim would be transported to the Dawn Center for the examination. Upon return to the facility, the nurse and the contract physician would coordinate follow-up care with the recommended treatment plan provided by the Center. The treatment would include any testing needed, providing prophylactic medications for sexually transmitted infections (STIs), and complete any necessary pregnancy testing. The auditor interviewed two (2) incarcerated individuals who had reported an allegation of sexual abuse. They told the auditor that they were seen immediately by a nurse after reporting their allegation. They did not report physical contact that

	<p>required such testing or prophylactic medications.</p> <p>The auditor reviewed the facility’s 21 sexual abuse investigation files from the previous 12 months. There were no investigations that contained an allegation of sexual abuse that led to the need for a forensic examination. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.82(d). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “All treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.”</p> <p>During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He stated that all incarcerated individual victims would receive these services at no cost. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Sexual Abuse Investigation files 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff 2. Targeted incarcerated individuals <p>Findings (by provision):</p> <p>115.83(a). In the PAQ, the facility provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “The Detention Center shall 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.”</p> <p>During the onsite phase of the audit, the auditor confirmed through interviews with the health care administrator, a nurse, and a mental health counselor that incarcerated individuals who report prior victimization are provided services, treatment, and counseling by medical staff. All individuals are fully screened by</p>

medical staff and provided services in the facility. Special attention is given to those that express prior victimization to ensure their safety. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The evaluation and treatment of such victims shall include, as appropriate follow up services, treatment plan, and when necessary, referrals for continued care following their transfer to or placement into other facilities, or their release from custody."

The auditor interviewed the health care administrator, a nurse, and a mental health counselor, during the onsite phase of the audit. All three confirmed that the facility works with community healthcare providers for follow-up and treatment of incarcerated individuals upon release. The auditor interviewed two (2) incarcerated individuals who reported an allegation of sexual abuse during his incarceration. Both stated that he had been seen by the medical provider. They offered care, but they refused additional care. They both told the auditor they were fine and did not require additional services. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Detention Center shall provide such victims with medical and mental health services consistent with the community level of care."

During the onsite phase of the audit, the auditor met with the health care administrator, a nurse, and a mental health counselor. All three made it clear that all incarcerated individuals do receive care and services that are consistent with what is available outside the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(d). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests."

The auditor interviewed the health care administrator, a nurse, and a mental health counselor, who confirmed this policy. There were no medical records available for an incarcerated individual who was victimized in the facility that could be reviewed by the auditor, as there have been no female incarcerated individuals sexually abused in this manner over the last two (2) years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(e). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "If pregnancy results from sexual abuse the victim shall receive timely and comprehensive information and timely access to all lawful pregnancy related medical services."

The auditor interviewed the health care administrator, a nurse, and a mental health counselor, who confirmed this policy. There were no medical records available for an

incarcerated individual who was victimized in the facility that could be reviewed by the auditor, as there have been no female incarcerated individuals sexually abused in this manner over the last two (2) years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(f). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate."

The auditor interviewed the health care administrator, a nurse, and a mental health counselor, who confirmed this policy. There were no medical records available for an incarcerated individual who was victimized in the facility in a manner that would require such testing. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(g). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident."

During the onsite phase of the audit, the auditor interviewed the PREA coordinator. He stated that all incarcerated individual victims would receive these services at no cost. The auditor interviewed two (2) incarcerated individuals who reported an allegation of sexual abuse during his incarceration. Both stated they were charged no fees related to the medical or mental health care received due to the filing of this sexual abuse or sexual harassment allegation. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.83(h). The Hernando County Detention Center is a county jail facility, and this provision does not apply. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. Sexual Abuse Investigation files 3. <i>PREA Incident Review</i> form

2. Interviews:
 1. Specialized staff
 2. Incident review team

Findings (by provision):

115.86(a). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Detention Center shall conduct an incident review within 30 days of the conclusion of every sexual abuse or sexual harassment investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded."

The PREA coordinator provided the auditor with the facility's 21 sexual abuse investigation files from the previous 12 months. Each of the 21 files reviewed contained written proof that an incident review took place, except for those where the outcome of the investigation is unfounded. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86(b). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Detention Center shall conduct an incident review within 30 days of the conclusion of every sexual abuse or sexual harassment investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded."

The PREA coordinator provided the auditor with the facility's 21 sexual abuse investigation files from the previous 12 months. Each of the 21 files reviewed contained written proof that an incident review took place, except for those where the outcome of the investigation is unfounded. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86(c). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The review team shall include upper level management officials, with input from line supervisors, investigators and medical or mental healthcare professionals."

During the onsite phase of the audit, the auditor interviewed the Major, the jail administrator. He confirmed that the facility takes all incidents of sexual abuse seriously and conducts the incident review at the conclusion of the investigation. The auditor reviewed the facility's 21 sexual abuse investigation files from the previous 12 months. Each file, except for those that were determined to be unfounded, showed a completed sexual abuse incident review meeting on *PREA Incident Review* form, which documents the findings of the review and documents those that participated in the meeting. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86(d). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The review team shall: a. Consider whether the allegation or investigation indicates a need to change policy or practice

to better prevent, detect, or respond to sexual abuse and sexual assault. b. Consider whether the incident or allegation was motivated by race, ethnicity, sexuality, sexual identity, sexual status or perceived status, gang affiliation, or was motivated by other group dynamics. c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse. d. Assess the adequacy of staffing levels in that area during different shifts. E. Assess whether monitoring technology should be deployed or augmented to supplement staff supervision. F. Prepare a report of the incident review team’s findings including, but not limited to, determinations made pursuant to the proceeding paragraphs of this section, and any recommendations for improvement and submit such report to the Jail Administrator and PREA Coordinator.”

The auditor reviewed the facility’s 21 sexual abuse investigation files from the previous 12 months. Each file, except for those that were determined to be unfounded, showed a completed sexual abuse incident review meeting on *PREA Incident Review* form, which documents the findings of the review and documents those that participated in the meeting. The review was complete with the assessment and any recommendations for improvement. The auditor interviewed the Detention Inspector, who confirmed attendance at incident review meetings and the need to identify any issues behind the allegations. The auditor also interviewed the PREA coordinator. He was clear that recommendations from these incident reviews were taken seriously by the agency. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.86(e). In the PAQ, the facility provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, “The Hernando County Detention Center shall implement the recommendations for improvement, or shall document its reasons for not doing so.”

The auditor was not provided written proof of implementation for improvement that was spurred by incident reviews. The PREA coordinator confirmed that the facility was unable to provide such documentation due to having no incidents with recommendations for improvement noted. The auditor interviewed the Major, the facility administrator, during the onsite audit. The Major stated that any incident review that noted recommendations would immediately be addressed and he would take action to make corrections necessary to avoid future sexual abuse incidents. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. *Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report*

Findings (by provision):

115.87(a). The facility provided the auditor with *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The PREA Inspector shall collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. The incident based data collected shall include, at a minimum, the data necessary to answer all the questions from the most recent version of the *Survey of Sexual Violence* conducted by the Department of Justice."

The auditor was provided with the *Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report*. The set of definitions utilized for the data collection and listed in the report are in line with the definitions listed on the *Survey of Sexual Violence* conducted by the Department of Justice (DOJ). Based on this analysis, the auditor finds the facility in compliance with this provision.

115.87(b). This provision is included in *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The PREA Inspector shall aggregate the incident based sexual abuse data at least annually."

115.87(c). This provision is included in *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The PREA Inspector shall collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. The incident based data collected shall include, at a minimum, the data necessary to answer all the questions from the most recent version of the *Survey of Sexual Violence* conducted by the Department of Justice."

The auditor was provided with the *Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report*. The set of definitions utilized for the data collection and listed in the report are in line with the definitions listed on the *Survey of Sexual Violence* conducted by the DOJ. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.87(d). This provision is included in *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*. The policy states, "The Detention Center shall maintain, review and collect data as needed from all available incident based documents including reports, investigation files, and sexual abuse incident reviews." The auditor reviewed the annual report, which shows the data collected from the 2023 calendar year and summarized properly. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.87(e). The agency does not contract with any outside facilities for the housing of incarcerated individuals. Based on this analysis, the auditor finds the facility in

	<p>compliance with this provision.</p> <p>115.87(f). This provision is included in <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i>. The policy states, “Upon request, the Detention Center shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.”</p> <p>The agency stated in the PAQ that the DOJ has requested completion of the <i>Survey of Sexual Violence (SSV)</i> and properly completed and submitted the survey. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>
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115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> 2. <i>Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report</i> 2. Interviews: <ol style="list-style-type: none"> 1. Specialized staff <p>Findings (by provision):</p> <p>115.88(a). The auditor was provided <i>HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)</i> in the PAQ. The policy states, “The PREA Coordinator shall review data collected and aggregated pursuant to 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: a. Identifying problem areas. b. Taking corrective action on an ongoing basis. c. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.”</p> <p>The auditor reviewed a copy of the <i>Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report</i> and confirmed that the report contains information related to this provision. The auditor interviewed the PREA coordinator during the onsite phase of the audit. He confirmed that the agency reviews annual data to determine if there is a need to take corrective action to prevent additional sexual abuse incidents. The Major, the jail administrator, was also interviewed and confirmed that these annual reviews are completed. Information obtained through these reviews is written in the agency’s annual report. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.88(b). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “Such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the agency’s progress in addressing sexual abuse.”

The auditor reviewed a copy of the *Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report* and confirmed that the report contains information related to this provision. This report compares the data from 2022 with the data from 2023. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.88(c). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The report shall be approved by the Sheriff and made readily available to the public through it’s the Hernando County Detention Centers website.”

The auditor reviewed the agency’s website and found the agency’s annual report posted on the page dedicated to the Prison Rape Elimination Act. The auditor interviewed the Major, the jail administrator, during the onsite phase of the audit. The jail administrator confirmed that he reads and approves the annual report before it posted to the agency website. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.88(d). The auditor was provided *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* in the PAQ. The policy states, “The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.”

The auditor reviewed a copy of the *Hernando County Detention Center Prison Rape Elimination Act 2023 Annual Report* and confirmed that the report contains information related to this provision. There are no redactions on the annual report because the report does not contain any personal information. The PREA coordinator confirmed that any reports written and posted to their website would only contain unidentified information regarding aggregated sexual abuse data. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following evidence was analyzed in making the compliance determination:

1. Documents: (*Policies, directives, forms, files, records, etc.*)
 1. *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)*
 2. Sexual Abuse Investigation files
2. Interviews:
 1. Specialized staff

Findings (by provision):

115.89(a). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "The Detention Center shall ensure that data collected pursuant to 115.87 is securely retained by the PREA Inspector."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. He provided the auditor access to his office, where the sexual abuse data is secured and maintained for at least 10 years. The auditor located files from as far back as 2012, when the agency began filing investigations based on the PREA standards. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.89(b). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "The data collected shall be compiled into an annual report and be approved by the Jail Administrator and made readily available to the public through the agencies website."

The auditor reviewed the agency's website and found the agency's annual report posted on the page dedicated to the Prison Rape Elimination Act. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.89(c). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers."

The auditor reviewed the agency's website and found the agency's annual report posted on the page dedicated to the Prison Rape Elimination Act. There are no redactions on the annual report because the report does not contain any personal information. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.89(d). *HCSO General Order 7040.25 - Prison Rape Elimination Act (PREA)* was provided to the auditor in the PAQ. The policy states, "The Detention Center shall maintain sexual abuse data collected for at least 10 years after the date of the initial collection unless federal, state or local law requires otherwise."

During the onsite phase of the audit, the auditor interviewed the Detention Inspector. He provided the auditor access to his office, where the sexual abuse data is secured and maintained for at least 10 years. Based on this analysis, the auditor finds the facility in compliance with this provision.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>) <ol style="list-style-type: none"> 1. Agency website 2. Interviews: <ol style="list-style-type: none"> 1. PREA coordinator <p>Findings (by provision):</p> <p>115.401(a). This was the second audit completed by the Hernando County Detention Center. The auditor confirmed with the PREA coordinator that the HCDC had completed one prior PREA audit for the facility. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.401(b). This is the second year of the fourth PREA audit cycle. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.401(h). During the onsite phase of the audit, the auditor was given the opportunity to complete a full site review. This included full access to all areas of the facility, so the auditor could assess all operations and talk with staff and incarcerated individuals. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.401(i). During the onsite phase of the audit, the auditor was provided with all documentation requested in order to properly review and verify all operations related to the PREA standards. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.401(m). During the onsite phase of the audit, the auditor requested to interview a total of 36 incarcerated individuals. The facility provided a private room for the auditor to meet with each incarcerated individual for the interview, without interruption. Based on this analysis, the auditor finds the facility in compliance with this provision.</p> <p>115.401(n). The facility posted the required audit notice in every housing unit, on colored paper, printed in two languages. The notices were also seen in public areas throughout the facility, in the public lobby and in the visitation room. The audit notice included the auditor’s contact information and explained the process to send confidential information or correspondence. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none">1. Documents: (<i>Policies, directives, forms, files, records, etc.</i>)<ol style="list-style-type: none">1. Agency website2. Interviews:<ol style="list-style-type: none">1. PREA coordinator <p>Findings (by provision):</p> <p>115.403(f). This was the second audit completed by the Hernando County Detention Center. The auditor confirmed that the HCDC had posted the previous audit report on the agency website. The PREA coordinator confirmed the requirement in this standard to post the completed audit report on the agency website and agreed that the report will be posted to the website after it is received. Based on this analysis, the auditor finds the facility in compliance with this provision.</p>

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

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

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

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

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

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

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

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

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

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

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

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

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

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

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

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

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

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

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

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

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

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

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

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

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

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

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	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.)	yes
	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.)	no
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

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