

PREA Facility Audit Report: Final

Name of Facility: Waukesha County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 11/27/2024

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: Dave Andraska	Date of Signature: 11/27/2024

AUDITOR INFORMATION	
Auditor name:	Andraska, Dave
Email:	ddafalls@hotmail.com
Start Date of On-Site Audit:	10/23/2024
End Date of On-Site Audit:	10/25/2024

FACILITY INFORMATION	
Facility name:	Waukesha County Jail
Facility physical address:	515 West Moreland Boulevard , Waukesha , Wisconsin - 53188
Facility mailing address:	

Primary Contact

Name:	Larry Compton
Email Address:	Lcompton@waukeshacounty.gov
Telephone Number:	262-548-7170

Warden/Jail Administrator/Sheriff/Director	
Name:	Eric Severson
Email Address:	Sheriff@waukeshacounty.gov
Telephone Number:	262-541-7122

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

Facility Health Service Administrator On-site	
Name:	Ethan Wells
Email Address:	ewells@welpath.us
Telephone Number:	262-548-7170

Facility Characteristics	
Designed facility capacity:	481
Current population of facility:	440
Average daily population for the past 12 months:	411
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both womens/girls and mens/boys

<p>Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)</p>	
<p>Age range of population:</p>	17-81
<p>Facility security levels/inmate custody levels:</p>	Initial, Restricted, Medium, Direct, Close Custody, Electronic Monitoring
<p>Does the facility hold youthful inmates?</p>	Yes
<p>Number of staff currently employed at the facility who may have contact with inmates:</p>	142
<p>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</p>	61
<p>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</p>	142

AGENCY INFORMATION	
Name of agency:	Waukesha County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	515 West Moreland Boulevard, Waukesha, Wisconsin - 53188
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	

Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Larry Compton	Email Address:	lcompton@waukeshacounty.gov

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

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-10-23
2. End date of the onsite portion of the audit:	2024-10-25

Outreach

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

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	481
15. Average daily population for the past 12 months:	411
16. Number of inmate/resident/detainee housing units:	31
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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	437
19. 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:	2
20. 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:	4
21. 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:	5
22. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
23. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
24. 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:	5

<p>25. 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>4</p>
<p>26. 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>2</p>
<p>27. 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>2</p>
<p>28. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>5</p>
<p>29. 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>30. 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>31. 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>142</p>

32. 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:	142
33. 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:	61
34. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
35. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	17
36. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

37. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Confined persons were randomly selected from a roster provided by the facility on the first day of the onsite. Confined persons were selected based on housing unit, gender, age and race.
38. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
39. 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	
40. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	13
<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>	
41. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	2
42. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1

<p>43. 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:</p>	<p>1</p>
<p>44. 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:</p>	<p>0</p>
<p>44. 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>44. 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>Corroboration strategies included discussions with staff and file reviews/interviews with confined persons.</p>
<p>45. 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:</p>	<p>0</p>
<p>45. 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>45. 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>Corroboration strategies included discussions with staff and file reviews/interviews with confined persons.</p>
<p>46. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>48. 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>2</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>2</p>
<p>50. 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>51. 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>51. 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>51. 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>Corroboration strategies included discussions with the Jail Administrator, PREA Coordinator and staff that work segregated housing.</p>
<p>52. 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>53. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>

<p>54. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>55. 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>56. 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>57. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>17</p>
<p>58. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>59. 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>

60. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
61. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input type="checkbox"/> Other
63. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
64. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
64. Enter the total number of CONTRACTORS who were interviewed:	6
64. 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 checked="" type="checkbox"/> Food service <input checked="" type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
65. 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.

66. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Was the site review an active, inquiring process that included the following:	
67. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
69. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
70. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>71. 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>The Auditor had full, unimpeded access to all areas of the facility. During the site review, I observed that audit notices were prominently displayed in English and Spanish throughout the facility. I observed the facility layout, staff supervision of confined persons, security rounds, interaction between staff and confined persons, shower and toilet areas, placement of PREA posters, observation of availability of PREA information located adjacent to and in housing areas and by phone, search procedures, and availability and access of medical and mental health services. I observed and made note of the video monitoring system and camera placement throughout the facility, including viewing the monitor. Female staff members were observed announcing their presence when entering male living areas, and males were observed announcing their presence when entering female living areas. Housing units all had individual showers with privacy doors. An actual intake screening was observed on the first day of the on-site. PREA educational information was provided during intake and signed for by the confined person. A risk screening was observed at the time of intake. The risk screening form was observed to include all required information. While onsite, hotline numbers were called and found to be in working order.</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>72. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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73. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

The Auditor conducted a document review of employee, contractors, volunteers and confined persons Individual files and also log books and other institutional forms. The Auditor reviewed a random sampling of personnel files to determine compliance related to standards on hiring and promotion and background check procedures for staff. The auditor reviewed the annual PREA training curriculum and rosters maintained by the training staff. 18 random confined person individual case files were reviewed to evaluate intake procedures, including screening and subsequent housing decisions, and verify prisoner PREA education.

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.

74. 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	3	3	3	3
Staff-on-inmate sexual abuse	4	1	4	1
Total	7	4	7	4

75. 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	15	13	15	13
Staff-on-inmate sexual harassment	5	3	5	3
Total	20	16	20	16

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.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	2	1	0
Staff-on-inmate sexual abuse	1	3	0	0
Total	1	5	1	0

Sexual Harassment Investigation Outcomes

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

78. 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	2	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	2	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	2	3	2	8
Staff-on-inmate sexual harassment	0	5	0	0
Total	2	8	2	8

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

80. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	3
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<p>81. 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>82. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>83. 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>84. 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>85. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>86. 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>87. 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>88. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>89. 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>90. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>91. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>92. 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	
93. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
94. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
95. 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)
96. 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	
97. 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

98. 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

99. 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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. Waukesha County Jail (WCJ) Pre-Audit Questionnaire (PAQ) b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Agency Organizational Chart 2. Interviews: <ol style="list-style-type: none"> a. PREA Coordinator b. PREA Compliance Manager c. Random Staff d. Random Confined Persons 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings: 115.11(a): The Facility indicated compliance with this provision and provided the Agency PREA</p>

Policy in its PAQ. The Jail Policy and Procedure 361.12 (p. 1) establishes: The Waukesha County Sheriff's Department is committed to zero tolerance of the sexual abuse and harassment of inmates, by staff, volunteers, contractors, or by other inmates and will comply with the national jail standards to prevent, detect and respond to sexual abuse in correctional institutions as mandated by the Prison Rape Elimination Act. A comprehensive plan regarding prevention, detection and response to inmate sexual harassment and abuse is in place in the Waukesha County Jail in order to appropriately address this area of inmate safety and facility security to minimize its impact in the institution.

The responses provided on the Facility PAQ indicated:

1. That the agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly.
2. That the facility has a written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.
3. That the policy includes definitions of prohibited behaviors.
4. That the policy includes sanctions for those found to have participated in prohibited behaviors.
5. That the policy includes a description of the agency's strategies and responses to reduce and prevent sexual assault and sexual harassment of confined persons.

The auditor reviewed the written policy and found it to be a comprehensive policy which clearly mandate a zero-tolerance on all forms of sexual abuse and harassment and outlines how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The language in the policies provides definitions of prohibited behaviors in accordance with the standard and includes sanctions for those who have been found to have participated in prohibited behaviors. The definitions contained in the policy are consistent and in compliance with PREA definitions.

Interviews with random staff indicated that they were trained in and understood the zero-tolerance policy. They understand their role regarding prevention, detection, and response procedures for PREA allegations. The facility trains all staff on an annual basis. Interviews with random confined persons indicated they all received education about the zero-tolerance policy when they first arrived at the facility. The auditor reviewed both the staff PREA training curriculum and the PREA material provided to the confined persons, and both contain information regarding WCJ zero tolerance policy.

115.11(b-c):

The Facility indicated compliance with this provision and provided the Agency PREA Policy and organization chart in its PAQ responses. The Jail Policy and Procedure 361.12 (pp 10-11) establishes, PREA Coordinator and PREA Compliance Manager.
a) Coordinator: The jail administrator or designee will assign an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee the Waukesha County Sheriff's Department Jail Division efforts to comply with the PREA standards.

	<p>b) Compliance Manager: The jail administrator or designee will assign a PREA compliance manager with sufficient time and authority to coordinate each facility's efforts to comply with the PREA standards.</p> <ol style="list-style-type: none"> 1. All 1500 shift supervisors will be designated as Compliance Managers for the purpose of this policy. <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. That the agency employs an upper-level, agency-wide PREA Coordinator. 2. That the PREA Coordinator has sufficient time and authority to develop, implement, and oversee the agency efforts to comply with the PREA standards. 3. The position of the PREA Coordinator in the agency's organizational structure: 4. The facility has designated a PREA Compliance manager. 5. The PREA Compliance Manager has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. <p>The Agency Organizational Chart outlines the PREA Coordinator and PREA Manager positions within the organization.</p> <p>The auditor interviewed the PREA Coordinator. He reported that he has sufficient time and authority to develop, implement, and oversee agency efforts to comply with PREA standards. He indicated he reports to a Captain but for PREA related issues he has direct access to the Jail Administrator. The auditor interviewed a Facility PREA Compliance manager. He reported he has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.</p> <p>After review of the policies, memos, organizational charts, training, observations, and interviews with the Facility staff, confined persons and the PREA Coordinator and PREA Compliance Manager the auditor concluded that the Agency and Facility is committed to the prevention, detection and response to sexual abuse and sexual harassment.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.12	Contracting with other entities for the confinement of inmates
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ 2. Interviews: <ol style="list-style-type: none"> a. Agency Head

	<p>Findings:</p> <p>115.12(a-c):</p> <p>The PAQ states that facility has not entered into or renewed a contract for the confinement of inmates since the last PREA audit.</p> <p>Interview with the Agency Head confirmed that the agency has not entered into or renewed a contract for the confinement of inmates since the last PREA audit.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.13	Supervision and monitoring
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Waukesha County Sheriff's Department/Jail Policy and Procedure 356.8 d. Waukesha County Sheriff's Department/Jail Policy and Procedure 350.11 e. Waukesha County Sheriff's Department/Jail Policy and Procedure 350.13 f. Staffing Plan g. Annual Review of the Staffing plan h. Supervisor rounds documentation i. Facility floor plan with camera locations 2. Interviews: <ol style="list-style-type: none"> a. Jail Administrator b. PREA Coordinator c. Intermediate- or Higher-Level Facility Staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.13 (a):</p> <p>The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. Waukesha County Sheriff's Department/Jail Policy and Procedure 350.11, Outlines that once each year, the Jail Administrator (or designee) will conduct a review of the Jail Division's operations and programs, organizational chart and plan, personnel needs, space and equipment requirements, and the policies and procedures governing the management of the Division and jail operations.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. That the facility develops and documents a staffing plan that provides for adequate

levels of staffing.

2. That the average daily number of confined persons was 481 since the last PREA audit and that the staffing plan was developed based on 481 confined persons.

An Interview with PREA Coordinator corroborated that a staffing plan has been developed for the facility that provides adequate levels of staffing and video monitoring. The plan is reviewed each year. An Interview with the Jail Administrator corroborated that a staffing plan is in place that is reviewed each year. The staffing plan takes into account the number and composition of confined persons, the physical layout of the facility, as well as the availability of cameras and mirrors throughout the facility, the number of substantiated and unsubstantiated incidents of sexual abuse and any other relevant factors.

The auditor reviewed the approved facility staffing plan, the Annual reviews of facility staffing plan for the past three years and Facility layout diagram with camera locations. These documents take into consideration the four requirements of this provision.

During the site review, the auditor observed staffing over all shifts and no areas were identified that needed additional or enhanced supervision. Camera and mirror placement were reviewed, and they covered all blind spots and entrance/exits to areas where confined persons were not allowed.

115.13(b):

The Facility indicated not applicable in its PAQ response.

The responses provided on the Facility PAQ indicated N/A and indicated:

1. That there have been no deviations from the staffing plan.

Per an interview with Jail Administrator, she reported there were no deviations from the staffing plan. Informal conversations with staff regarding staffing levels indicated that overtime was available must normally not mandated. Staff confirmed that minimal staffing must be in place for each shift.

115.13(c):

The response provided on the Facility PAQ indicated:

1. That the staffing plan is reviewed yearly.

Per an Interview with PREA Coordinator, he reported that he reviews the staffing plan yearly in conjunction with agency leadership to determine if any adjustments need to be made with staffing levels, additional monitoring technology or allocation of facility resources are needed to ensure compliance with the staffing plan.

The Auditor reviewed the three Annual reviews, and they take into consideration the four requirements of provision (a) of this standard as well as if any adjustments are needed to the staffing patterns, deployment of video monitoring systems, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels.

115.13(d)

	<p>Waukesha County Sheriff’s Department/Jail Policy and Procedure 356.8 establishes; Routine, directed, scheduled and random inspections and patrols will be completed in the Waukesha County Jail facilities. At least once each operations shift, an assigned shift supervisor will make rounds of each duty position at the County Jail and Huber Facility. These rounds are formal in nature as they address Inmate Communication Forms at each duty post, a review of inmate housing unit check sheets, ensuring duty post equipment is accounted for and addressing facility cleanliness, sanitation, safety and security issues. These rounds are also informal in nature as the shift supervisors engage in conversation with the correctional and support staff, address appropriate inmate and staff concerns and otherwise maintain an approachable and genial presence throughout the jail facilities.</p> <p>These checks will be unannounced. Jail staff members are prohibited from alerting other staff members that these supervisory rounds are occurring,</p> <ol style="list-style-type: none"> 1. The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment 2. The unannounced rounds are documented. 3. Over time the unannounced rounds cover all shifts. 4. The facility prohibits staff from alerting other staff of the conduct of such rounds. <p>During the on-site audit, Intermediate- or Higher-Level Facility Staff were interviewed. They stated that they are required to make regular announced rounds throughout the entire facility per policy and the rounds are documented. The logs were reviewed by the auditor and found that rounds were being consistently completed and documented.</p> <p>Based upon the review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 356.10 c. Waukesha County Sheriff’s Department/Jail Policy and Procedure 362.8 2. Interviews: <ol style="list-style-type: none"> a. Line Staff who Supervise Youthful Inmates b. Youthful Confined persons 3. Site Review Observations:

a. Observations during on-site review of physical plant

Findings:

115.14 (a-c):

The Facility indicated compliance with this provision and provided Agency Policies in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.8 (p.1) establishes; Juvenile inmates will not be placed in a housing unit in which the juvenile inmate will be in sight, sound or physical contact with any adult inmate through the use of a shared dayroom or other common space, shower area or sleeping quarters. For the purpose of this policy, juvenile refers to any person under the age of 18 who is incarcerated at the Waukesha County Jail.

Best efforts will be made to avoid placing juvenile inmates in isolation to comply with this provision. Absent exigent circumstances, juvenile inmates will not be denied recreation and any legally required special education services to comply with this provision. In areas outside of the housing units, sight/sound separation must be maintained, or direct staff supervision must be provided. Direct staff supervision indicates a correctional officer is in the same room with, and within reasonable hearing distance of, the juvenile inmate.

The responses provided on the Facility PAQ indicated:

1. The facility prohibits placing youthful inmates in a housing unit in which a youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.
2. The facility has housing units to which youthful inmates are assigned that provide sight and sound separation between youthful and adult offenders in dayrooms, common areas, showers, and sleeping quarters.
3. The facility does not place youthful inmates in the SAME HOUSING UNIT as adults.
4. The facility maintains sight, sound, and physical separation between youthful inmates and adult inmates in areas OUTSIDE HOUSING UNITS.
5. The agency always provides direct staff supervision in areas OUTSIDE HOUSING UNITS where youthful inmates have sight, sound, or physical contact with adult inmates.
6. The facility documents the exigent circumstances for each instance in which youthful inmates' access to large-muscle exercise, legally required education services, and other programs and work opportunities was denied.

During the on-site audit, Line staff that supervise youthful offender and two youthful offenders were interviewed. Line staff that supervise youthful offenders reported youthful offenders have sight and sound separation from adult offenders. They have access to their own dayrooms where they can exercise and access to school and other programs. Outside of their housing unit they are also under direct staff supervision. The youthful offenders interviewed reported they are housed separate from adult offender. They have access to school and can exercise in the dayroom.

Based upon the review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.15	Limits to cross-gender viewing and searches
	<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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 356.10 c. Waukesha County Sheriff's Department/Jail Policy and Procedure 356.2 d. Waukesha County Sheriff's Department/Jail Policy and Procedure 356.4 e. Waukesha County Sheriff's Department/Jail Policy and Procedure 362.9 f. Training Curriculum 2. Interviews: <ol style="list-style-type: none"> a. PREA Coordinator b. Random staff c. Random confined persons 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.15 (a):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 356.10 (p. 4), Strip Search Process.</p> <ol style="list-style-type: none"> a. SAME SEX. A correctional officer of the same sex as the inmate will conduct the search. If the inmate is transgender, refer to jail policy 362.9 Transgender Inmates. b. NO CONTACT. Only a visual inspection will be made; however, constant visual observation of the inmate should be maintained at all times. c. PRIVACY. The inmate will not be exposed to the view of any person not conducting the search. The search will not be reproduced through a visual or sound recording. d. ORDER. The search will proceed in an orderly manner, the correctional officer explaining to the inmate what will be expected of the individual. <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. That the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of confined persons. 2. That there has been zero cross-gender strip or cross-gender visual body cavity searches of confined persons in the past twelve months. <p>To corroborate the information provided in the PAQ (that there have been no cross-gender strip or visual body cavity searches conducted), this auditor asked random confined persons whether they had been or know of another person that had been the subject of a cross-gender strip search or visual body cavity search. All responded with "No", strip searches are conducted by a staff of the same sex and always in a private setting. Further, this auditor asked all random staff whether these searches were permitted to be conducted. All staff interviewed reported that they were not</p>

allowed to conduct cross-gender strips or visual body cavity searches of confined persons. As such there were no cross-gender strip or cross-gender visual body cavity search logs to review.

115.15(b-c):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 356.2 (pp. 1-2) establishes:

A thorough pat-down search will be conducted on inmates following any movement within the facility, refer to 5a above.

The prisoner will be instructed to approach and face the frisk pad. The prisoner will be instructed to spread their feet apart and raise and extend their arms to the side (palms up, arms raised and extended like the wings of an airplane). An officer of the same sex as the person being searched will

The responses provided on the Facility PAQ indicated:

1. That the facility does not permit cross-gender pat-down searches of female confined persons.
2. That female confined persons are not restricted access to regularly available programming in order to comply with this provision.
3. That zero pat-down searches of female confined persons have been conducted by male staff.
4. That Facility policy requires all cross-gender strip searches and cross-gender visual body cavity searches be documented.

During Random Staff interviews, they stated that cross-gender pat-searches of female confined persons is not allowed at the facility. They stated only staff of the same sex can conduct a pat-down search. Staff stated that because there are always female staff on duty access to programming is not restricted. Random female confined persons interviewed stated they were not aware of any circumstances where a male has had to pat-search a female confined person. There are always female staff on duty.

115.15 (d):

Waukesha County Sheriff's Department/Jail Policy and Procedure 356.4 (p. 4) establishes;

Upon entering opposite gender housing units (male officers entering female housing unit or zone or female officers entering male housing unit or zone), staff will announce their presence i.e. "male officer entering" each time they are entering the unit or zone.

a. Inmates will be able 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 well-being checks.

The responses provided on the Facility PAQ indicated:

1. That the facility has implemented policy and procedures that enable confined persons to shower, perform bodily functions and change clothing without non-medical

staff of the opposite gender viewing their breasts, buttocks, or genitalia except in exigent circumstances or when viewing is incidental to routine cell checks.

2. Reported that policy and procedures require staff of the opposite gender to announce their presence when entering an area where confined persons are likely to be showering, performing bodily functions, or changing clothes.

Random confined person interviewed stated that staff of the opposite gender consistently announces their presence when entering an area where they may be showering, using the toilet, or changing their clothes. Random Staff interviewed stated that they always announce themselves when entering an area where confined persons of the opposite gender are living. Staff interviewed also stated that confined persons are able to dress, shower and use the toilet without being viewed by staff of the opposite gender.

During the Facility site review, the auditor observed that mirrors and camera placement do not provide views into areas where confined persons shower, toilet or change clothes. Staff made loud verbal announcements before entering housing areas of confined persons of the opposite gender.

115.15(e):

Waukesha County Sheriff's Department/Jail Policy and Procedure 362.9 (p.1) establishes;

Waukesha County Jail staff will not search or physically examine a transgender 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, 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.

The responses provided on the Facility PAQ indicated:

1. That there is a policy prohibiting staff from searching or physically examining a transgender or intersex confined person for the sole purpose of determining genital status.
2. That zero searches as described above have occurred in the past 12-months.

Random Staff interviewed reported that they were aware of policy prohibiting the searching or physically examining of transgender or intersex confined persons for the sole purpose of determining genital status. Two transgender confined persons were interviewed and reported this type of search was not conducted.

115.15(f):

The responses provided on the Facility PAQ indicated:

1. That 100% of security staff received training on conducting cross-gender pat-down searches and searches of transgender and intersex confined persons in a professional and respectful manner.

During Interviews with random staff, they stated that they had received training in conducting cross-gender pat-down searches as well as searching transgender and intersex confined persons in a professional and respectful manner.

	<p>The auditor reviewed the training curriculum and a random sampling of training files. The training files revealed that all staff had received and acknowledged training on conducting cross-gender pat down searches and searches of transgender and intersex confined persons.</p> <p>Based upon the review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. PREA Confined person Education Manual (English/Spanish) e. PREA Confined person Education Manual – Large Print (English/Spanish) f. Confined person reporting options posters (English/Spanish) g. Language line contract 2. Interviews: <ol style="list-style-type: none"> a. Agency Head b. Random staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.16 (a-b):</p> <p>The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 (p.4) establishes, Inmate Notification and Education. The inmate population will be notified of the zero tolerance policy of the institution towards inmate on inmate sexual harassment and/or abuse and will also receive comprehensive education regarding their right to be free from sexual abuse and harassment, including inmates with limited English and/or with disabilities. This information and education will be disseminated in a variety of ways.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency has established procedure to provide disabled confined person equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual assault and sexual harassment. 2. The agency has established procedures to provide confined persons with limited

English proficiency equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual assault and sexual harassment.

Per an interview with Agency Head, he stated the jail facilities have developed PREA education materials in various formats to ensure that those individuals with disabilities and those who are limited English proficient can equally benefit from the PREA program. We have developed posters, pamphlets, videos, large print materials, etc. as well as provide TTY phones, access to language lines and designated staff interpreters to ensure we can effectively communicate the PREA procedures and available services. Interviews with random staff confirmed PREA material was available in English and Spanish. They also reported that numerous staff at the facility were bilingual and can speak English and Spanish.

During the site review, the auditor observed that Telecommunication Device for the Deaf (TDD) were available to use in the event a confined person was housed at the facility who was deaf. The Facility provided a copy of the contact for translation services. Instructions for use of this service were available for staff to use in the privacy of staff offices. Educational material was observed in both English and Spanish.

115.15(c):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 7) establishes, f) Inmate interpreters, inmate sign readers or other types of inmate assistance will not be utilized except in limited circumstances where an extended delay in obtaining an effective interpreter would compromise the inmate's safety, the performance of first-response duties or the investigation of the inmate's allegations.

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The responses provided on the Facility PAQ indicated:

1. That the agency prohibits the use of confined person interpreters except in limited circumstances where an extended delay could compromise the confined person's safety, the performance of first responder duties or the investigation of the confined person's allegations.
2. Reported that any use of confined person interpreters is documented.
3. Reported that in the past 12 months there were zero instances where confined persons were used to interpret.

Staff interviewed stated that it was against policy to other confined persons to interpret. Staff also stated that there was a language line available when interpretation services were needed and staff members who were bilingual were not present. Interviews with confined persons who were limited English proficient indicated they received PREA information in a language they required.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.17	Hiring and promotion decisions
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1374 378">The following evidence was analyzed in making the compliance determination:</p> <ol data-bbox="256 389 1342 837" style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Staff personnel files 2. Interviews: <ol style="list-style-type: none"> a. Jail Administer b. HR Manager c. Detective who completes background checks d. PREA Coordinator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p data-bbox="256 882 384 916">Findings:</p> <p data-bbox="256 927 416 960">115.17 (a):</p> <p data-bbox="256 972 1469 1072">The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 2) establishes, 2) Hiring and Promoting.</p> <p data-bbox="256 1084 1453 1196">a) The Waukesha County Jail will not hire or promote anyone who may have contact with inmates, and will not enlist the services of any contractor or volunteer who may have contact with inmates, who has:</p> <ol data-bbox="256 1218 1469 1487" style="list-style-type: none"> 1. Engaged in sexual abuse in prison, jail, lockup, community confinement or juvenile facility or other institution as defined in 42 USC 1997. 2. Been convicted of engaging in or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion, or the victim did not consent or was unable to consent or refuse. 3. Been civilly or administratively adjudicated to have engaged in the activity described in (b) above. <p data-bbox="256 1532 1007 1565">The responses provided on the Facility PAQ indicated:</p> <p data-bbox="256 1576 1453 1688">That the agency policy prohibits hiring or promoting anyone who may have contact with confined persons and prohibits enlisting the services of any contractor who may have contact with confined persons who:</p> <ol data-bbox="256 1711 1453 1980" style="list-style-type: none"> 1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. 2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse. 3. Has been civilly or administratively adjudicated to have engaged in the activity described above. <p data-bbox="256 2024 1437 2058">Interview with the HR Manager confirmed that WCJ is prohibited from hiring anyone</p>

who meets the criteria listed above. The review of random employee files revealed that staff hired or promoted in the past 12 months had criminal record background checks conducted and questions regarding past conduct are being asked and answered during interviews.

115.17(b):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 2) establishes, b) The Waukesha County Jail administration will consider any incident of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer, who may have contact with inmates.

Interview with the HR Manager and Jail Administrator confirmed that WCJ considers any incidents of Sexual Harassment in determining whether to hire or promote anyone.

115.17(c):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 1) establishes; c) Before hiring new employees who may have contact with inmates, the Waukesha County Sheriff's Department (WSD) will perform a criminal background check and, consistent with federal, state and local law, make its best efforts to contact all prior employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

The responses provided on the Facility PAQ indicated:

1. The agency policy requires that before it hires any new employee who may have contact with confined persons, it conducts a criminal background record check and makes its best efforts to contact all prior institutional employers for information on substantiated allegation of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.
2. In the past 12 months, 72 persons were hired who may have contact with inmates who have had criminal background record checks:

Interview with the HR Manager confirmed that comprehensive criminal background checks are completed by a WSP detective. Interview with the WSP Detective explained in detail the background check process. If the applicant had previously worked at an institution they would contact the employer.

Review of random employee files revealed that all had background checks completed and if required contact was made with institutional employers for information on substantiated allegation of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

115.17(d):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 2) establishes; d) WSD will also perform a criminal background records check before enlisting the services of any contractor or volunteer who may have contact with inmates.

1. The Waukesha County Sheriff's Department (WSD) will perform a criminal records

check for contractors and volunteers every 2 years.

The responses provided on the Facility PAQ indicated:

1. The agency policy requires that a criminal background check be completed before enlisting the services of any contractor who may have contact with confined persons.

Interview with the HR Manager confirmed criminal background checks are completed for contractors.

115.17(e):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p.2) establishes; The Waukesha County Sheriff's Department (WSD) will perform a criminal records check for all employees every 5 years.

The responses provided on the Facility PAQ indicated:

1. That the agency policy requires that a criminal background check be conducted at least every five years for current employees and contractors who may have contact with confined persons.

Interview with the PREA Coordinator confirmed that background checks are completed every five years.

Review of files revealed that background checks are completed every five years.

115.17(f-g):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 3) establishes; a) The Waukesha County Jail will not hire or promote anyone who may have contact with inmates, and will not enlist the services of any contractor or volunteer who may have contact with inmates, who has:

1. Engaged in sexual abuse in prison, jail, lockup, community confinement or juvenile facility or other institution as defined in 42 USC 1997.

2. Been convicted of engaging in or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion, or the victim did not consent or was unable to consent or refuse.

3. Been civilly or administratively adjudicated to have engaged in the activity described in (b) above

e) Material omissions regarding such misconduct, or the provision of materially false information, will be grounds for termination.

Interview with the PREA Coordinator confirmed that all applicants are asked these questions during the interview process. He confirmed all employees have a continuing affirmative duty to disclose any such conduct and material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Review of interview forms revealed that these questions are asked during the interview process.

115.17(h):

	<p>The Facility indicated compliance with this provision in its PAQ.</p> <p>Interview with the HR Manager confirmed that they will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving request. She indicated how this information was provided on a recent request.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.18	Upgrades to facilities and technologies
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ 2. Interviews: <ol style="list-style-type: none"> a. Jail Administrator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings 115.18(a-b): The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The facility has not acquired a new facility or made a substantial expansion or modification to existing facilities since the last PREA audit. 2. The facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology the last PREA audit. <p>Interview with the Jail Administrator confirmed that the facility has not acquired a new facility or made a substantial expansion or modification to existing facility. She reported additional cameras were added to storage and janitorial room to monitor these areas for potential PREA allegations.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>

115.21	Evidence protocol and forensic medical examinations
	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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Waukesha County Sheriff's Department Policy and Procedure 11.01
 - c. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06
 - c. SAFE/SANE provider information
 - d. Waukesha County Guideline for Responding to Sexual Assault
2. Interviews:
 - a. PREA Coordinator
 - b. Medical staff
 - c. Random Staff
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.21 (a-b):

The Facility indicated compliance with this provision and provided the Agency Policies in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 7) establishes: Investigation. An administrative or criminal investigation will be completed for all allegations of sexual harassment or abuse. The sexual abuse incident will be turned over to the Waukesha County Sheriff's Department and investigated by personnel who are trained in sexual abuse investigations in a correctional setting. Prosecution of offenders will be vigorously pursued by the Department as well as internal disciplinary action against the offender.

The Waukesha County Sheriff's Department Policy and Procedure 11.01 (p. 1) establishes;

The purpose of this Policy & Procedure is to establish guidelines for the collection and preservation of physical evidence. The duties and responsibilities of the Identification Detective and investigating Deputy will be addressed in this Policy & Procedure.

It is the objective of the Waukesha County Sheriff's Department that all sworn members conform to uniform procedures for the collection, preservation and security of physical evidence. The Department shall provide basic training (incorporated into the field training phase) for all Deputies in proper collection and preservation of evidence.

The responses provided on the Facility PAQ indicated:

1. The agency is responsible for conducting administrative sexual abuse investigations.
2. The agency is responsible for conducting criminal sexual abuse investigations
3. When conducting sexual abuse investigations, the agency investigators follow uniform evidence protocol.

Interviews with random staff indicated they understood the agency's protocols for preserving and maintaining physical evidence if a confined person alleges sexual abuse and gave examples of the steps they would take.

115.21(c):

The Facility indicated compliance with this provision and provided the Wellpath PREA Policy in its PAQ. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (pp 1 & 6) establishes; Treatment services are provided free of charge to every victim of sexual abuse, regardless of whether the victim discloses the name of the abuser or fails to cooperate with any investigation arising out of the incident.

6.11.1. QHP will complete a baseline history and assessment to determine time and date of incident and current presenting physical and mental status, and QHP will stabilize the patient for transport to the designated SART hospital.

- Communication with staff at the designated SART hospital includes, but is not limited to: alert of impending arrival; prior medical/mental health history; current treatment, medications, and allergies; any actions/treatments taken related to the sexual assault; and what, if anything, will be sent with the patient.

6.11.2. QHP will prepare the patient for the forensic exam by describing who will perform the exam, the process, the purpose, where the exam will be conducted, the presence of an advocate and custody staff during the exam, confidentiality of information, and reporting mandates.

6.11.3. QHP will obtain consent from the patient for transfer for the forensic exam.

- NOTE: Patients have a right to refuse the exam. It cannot and will not be performed unless the patient consents. If a patient refuses the exam, do not transfer to the hospital. If needed, consult with the SART staff at the hospital.

The responses provided on the Facility PAQ indicated:

1. The facility offers all confined persons who experience sexual abuse access to forensic medical examinations.
2. Forensic examinations are offered without financial cost to the victim.
3. Examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).
4. When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations.
5. The facility documents efforts to provide SANEs or SAFE's.
6. There were zero forensic medical exams conducted during the past 12 months.
7. There were zero exams performed by SANEs/SAFEs during the past 12 months.
8. There were zero exams performed by a qualified medical practitioner during the past 12 months.

The Medical staff confirmed there were zero SANE exams conducted during the past 12 months

115.21(d-e):

Waukesha County Guideline for Responding to Sexual Assault indicates mission of the Waukesha County Sexual Assault Response Team is to facilitate a community-based collaborative response to all victims of sexual assault by providing immediate and follow-up medical, advocacy and criminal justice services in an ethical, compassionate and culturally sensitive manner.

The responses provided on the Facility PAQ indicated:

1. The facility attempts to make available to the victim a victim advocate from a rape

	<p>crisis center either in person or by other means.</p> <p>2. That all efforts are documented.</p> <p>3. if requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.</p> <p>The PREA Coordinator confirmed the WCJ ensures confined persons are offered access to a community-based provider capable of providing emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews. There were no confined persons in the facility at the time of the onsite audit who had reported a sexual abuse.</p> <p>115.21(f): WSD is responsible for investigating all allegations of sexual abuse; therefore, this provision is not applicable.</p> <p>115.21(g): Auditor is not required to audit this provision.</p> <p>115.21(h): Waukesha County Jail would utilize the Women’s Center which provides victim advocates. Waukesha County Jail does not utilize facility employees as victim advocates.</p> <p>The PREA Coordinator confirmed Waukesha County Jail does not utilize facility employees as victim advocates.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Agency Website e. Investigative log and files 2. Interviews: <ol style="list-style-type: none"> a. Agency Head 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant

Findings:

115.22 (a):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p.7) establishes; Investigation. An administrative or criminal investigation will be completed for all allegations of sexual harassment or abuse. The sexual abuse incident will be turned over to the Waukesha County Sheriff's Department and investigated by personnel who are trained in sexual abuse investigations in a correctional setting. Prosecution of offenders will be vigorously pursued by the Department as well as internal disciplinary action against the offender.

The responses provided on the Facility PAQ indicated:

1. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.
2. That in the past 12 months there were 27 allegations of sexual abuse and sexual harassment that were received.
3. That In the past 12 months, there were six allegations resulting in an administrative investigation:
4. That In the past 12 months, there were 21 allegations referred for criminal investigation.
5. During the past 12 months, of the 27 allegations reported, 24 administrative and/or criminal investigations were completed and three are in progress.

During the interview with the Agency Head, he stated that all allegations of sexual abuse and sexual harassment are investigated.

115.22(b):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p.7) establishes: Investigation. An administrative or criminal investigation will be completed for all allegations of sexual harassment or abuse. The sexual abuse incident will be turned over to the Waukesha County Sheriff's Department and investigated by personnel who are trained in sexual abuse investigations in a correctional setting. Prosecution of offenders will be vigorously pursued by the Department as well as internal disciplinary action against the offender.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations.
2. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is published on the agency website.
3. The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation.

Interview with the Investigative staff confirmed the Waukesha Sheriff Department has the legal authority to conduct criminal investigations. Review of the Agency's website corroborated that the agency publishes their policy regarding investigations on their

	<p>website.</p> <p>115.22(c-d): These provisions are not applicable as agency/facility is responsible for criminal investigations.</p> <p>115.22(e): Auditor is not required to audit this provision.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. PREA Staff Training Curriculum d. PREA Staff Training Acknowledgements 2. Interviews <ol style="list-style-type: none"> a. PREA Coordinator b. Random Staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.31 (a &c):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 5) establishes; Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated regarding the Department's zero tolerance for sexual misconduct. Sexual misconduct on the part of staff members includes sexual harassment, abuse, over-familiarity and retaliation.</p> <p>Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated on what they can do to prevent, detect and respond to inmate sexual harassment and/or abuse.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency trains all employees who may have contact with confined persons on the agency's zero-tolerance policy for sexual abuse and sexual harassment. 2. The agency trains all employees who may have contact with confined persons on

how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.

3. The agency trains all employees who may have contact with confined persons on the right of confined persons to be free from sexual abuse and sexual harassment.

4. The agency trains all employees who may have contact with confined persons on the right of confined persons and employees to be free from retaliation for reporting sexual abuse and sexual harassment.

5. The agency trains all employees who may have contact with confined persons on the dynamics of sexual abuse and sexual harassment in confinement.

6. The agency trains all employees who may have contact with confined persons on the common reactions of sexual abuse and sexual harassment victims.

7. The agency trains all employees who may have contact with confined persons on how to detect and respond to signs of threatened and actual sexual abuse.

8. The agency trains all employees who may have contact with confined persons on how to avoid inappropriate relationships with confined persons.

9. The agency trains all employees who may have contact with confined persons on how to communicate effectively and professionally with confined persons, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming confined persons.

10. The agency trains all employees who may have contact with confined persons on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

11. Between trainings the agency provides employees who may have contact with confined persons receive refresher information about current policies regarding sexual abuse and harassment at staff meetings, department head meetings and through PREA postings.

12. Employees who may have contact with confined persons receive training on PREA requirements on an annual basis.

Interviews with random staff indicated they received initial training and annual training on all required aspects of this standard. Staff interviewed were able to provide details regarding various aspects of the training to demonstrate their understanding. They indicated the training is presented by a staff facilitator and they are required to take and pass a test at the end of the training. In addition to these trainings, they mentioned that PREA is also discussed at monthly staff meetings.

The auditor reviewed random employee training files and found that they contained a signed acknowledgement by staff that initial and annual training was provided and were required to pass a test at the completion of training. The PREA staff training curriculum was reviewed, and it includes all required aspects of this standard.

115.31(b):

The responses provided on the Facility PAQ indicated:

1. Training is tailored to the gender of the confined persons at the facility.
2. Employees who are reassigned from facilities housing the opposite gender are given additional training.

Review of the training curriculum found it contains training tailored to both male and

	<p>female confined persons.</p> <p>115.31(d):</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency documents that employees who may have contact with confined persons understand the training they have received through employee signature or electronic verification. <p>The auditor reviewed random employee training files and found that they contained a signed acknowledgement and were required to pass a test at the completion of training.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.32	Volunteer and contractor 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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12. c. Volunteer and contractor training records 2. Interviews: <ol style="list-style-type: none"> a. Contractors <p>Findings</p> <p>115.32(a-c):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 5) establishes; Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated regarding the Department's zero tolerance for sexual misconduct. Sexual misconduct on the part of staff members includes sexual harassment, abuse, over-familiarity and retaliation.</p> <p>Staff Response Training. Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated on what they can do to prevent, detect and respond to inmate sexual harassment and/or abuse.</p> <p>Contractors/Volunteers. Training will be provided to all contractors and volunteers members related to their particular job duties.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. That all volunteers and contractors who have contact with inmates have been

- trained on their responsibilities under the agency’s policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.
2. That there were 203 contractors and volunteers who have been trained.
 3. That the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates.
 4. That all volunteers and contractors who have contact with inmates have been notified of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.
 5. That the agency maintains documentation confirming that volunteers and contractors who have contact with inmates understand the training they have received.

The auditor reviewed training records of contract staff and volunteers and found that they contained a signed acknowledgement that training was provided, and they understood the training provided. In addition to PREA training provided by WCJ, Medical and Mental health staff employed by Wellpath and food service staff employed by Trinity also receive PREA training from their respective employers. Interviews with six contractors indicated they received PREA training related to their particular job duties.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of 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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Waukesha County Sheriff’s Department/Jail Policy and Procedure 351.1 d. Confined person PREA Education Pamphlet (English/Spanish) e. Confined person PREA Education Pamphlet acknowledgement receipts f. PREA confined person reporting options posters (English/Spanish) 2. Interviews <ol style="list-style-type: none"> a. Intake staff b. Random Confined persons 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p>

115.33 (a-b):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (pp. 3-4) establishes; The inmate population will be notified of the zero tolerance policy of the institution towards inmate on inmate sexual harassment and/or abuse and will also receive comprehensive education regarding their right to be free from sexual abuse and harassment, including inmates with limited English and/or with disabilities. This information and education will be disseminated in a variety of ways to include:

a) Issuance of the inmate PREA education pamphlet and notification of information included in the Inmate Rules and Information Packet as outlined in jail policy 351.1 Intake Process.

Education will include:

1. Their right to be free from sexual abuse and sexual harassment.
2. Their right to be free from retaliation for reporting such incidents.
3. Waukesha County Jail policies and procedures for responding to such incidents.
4. A review of the PREA Education pamphlet.
5. Reading the PREA Education of Inmates Training Outline (d).
6. Staff will read the PREA Education for Inmates Acknowledgment form to the inmate. The inmate will sign the form confirming receipt of training and the staff (witness) providing the education will sign the form.

PREA Education of Inmates Training Outline. The outline will address the following:

1. Waukesha County Jail Policies and Procedures.
 - a. The Waukesha County Sheriff's Department has a zero-tolerance policy for the any type of sexual abuse or harassment involving inmates or staff.
 - b. Waukesha County Jail policy and the County Jail and Huber Facility rules prohibit sexual abuse and harassment between inmates. Violations will result in disciplinary sanctions. Inmate-on-inmate sexual abuse will also be prosecuted.
 - c. Sexual acts between staff and inmates are ALWAYS prohibited and are a violation of jail policy as well as against the law. Violators are subject to discipline as well as prosecution punishable by prison sentences and fines.

The responses provided on the Facility PAQ indicated:

1. Confined persons receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.
2. 8,210 confined persons admitted during the past 12 months were given this information.

Interviews with random confined persons reported that they received information regarding the facility's zero-tolerance policy, their right to be free from sexual abuse and sexual harassment, their right to be free from retaliation for reporting sexual abuse and sexual harassment. Confined persons reported that they received this information on the day they arrived at the facility and it is part of the intake process which is completed as soon as they arrive at the facility. They reported they sign a

form confirming receipt of the PREA pamphlet.

Interviews with intake staff revealed that confined persons are provided with information regarding the facilities zero-tolerance policy and PREA information at the time of their intake. Intake staff reported PREA information is provided verbally and in writing. They also stated this same information is available to confined persons on kiosks in their housing area and on tablets issued to all confined persons.

During the Site review this auditor observed an intake of a confined person. Orientation included information about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The intake staff took his time to verbally explain the PREA policy and information to ensure the confined person understood the information before signing an acknowledgement for it. The confined person is provided with a PREA pamphlet and is required to sign an acknowledgement that he received it.

This auditor reviewed a random sampling of intake records which confirmed that confined persons signed acknowledgement for receipt of PREA information during the intake process. The intake records confirmed that confined persons received orientation the same day of arrival at the facility. The review of confined person PREA pamphlet confirmed it covers all relevant and required information. Informal conversations with staff disclosed that staff are available who are bi-lingual who can assist with translation when needed and that the facility has a contract to provide translation services.

115.33(b):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 3) establishes; c) Comprehensive Education. Within 30 days of intake, designated County Jail staff will provide comprehensive education to the inmates in person.

The responses provided on the Facility PAQ indicated:

728 confined persons admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake:

Interviews with staff confirmed all confined persons receive comprehensive PREA education within 30 days of intake. They stated the education is provided within 1-2 weeks of arrival when all confined persons are required to report to medical for a physical. Interviews with confined persons and review of signed acknowledgements corroborated receiving the PREA education.

115.33(c):

Interview with intake staff confirmed all confined persons receive PREA information

upon intake and comprehensive education within 30 days.

115.33(d)

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 3) establishes; The inmate population will be notified of the zero tolerance policy of the institution towards inmate on inmate sexual harassment and/or abuse and will also receive comprehensive education regarding their right to be free from sexual abuse and harassment, including inmates with limited English and/or with disabilities.

The responses provided on the Facility PAQ indicated:

1. Confined person PREA education is available in formats accessible to all confined persons, including those who are limited English proficient.
2. Confined person PREA education is available in formats accessible to all confined persons, including those who are deaf.
3. Confined person PREA education is available in formats accessible to all confined persons, including those who are visually impaired.
4. Confined person PREA education is available in formats accessible to all confined persons, including those who are otherwise disabled.
5. Confined person PREA education is available in formats accessible to all confined persons, including those who are limited in their reading skills.

Interview with intake staff indicated that confined person PREA orientation and education materials were available in both English and Spanish. If a language barrier existed, they would enlist the services of a staff member who was bilingual or utilize the Language Line. They reported they verbally explain the PREA information to all confined persons and would read materials to confined persons who were unable to read or had low vision.

During the on-site audit, confined persons who were limited English proficient were interviewed. They indicated they received PREA information in languages they required.

During the Site review, the auditor reviewed confined person education materials in both English and Spanish and observed that a TDD machine was available for confined persons who were deaf.

115.33(d):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 4) establishes; Staff will read the PREA Education for Inmates Acknowledgment form to the inmate. The inmate will sign the form confirming receipt of training and the staff (witness) providing the education will sign the form. The education acknowledgement form will be filed in the inmate's hard copy incarceration file. The officer completing the training will document the comprehensive education in the detention management system using the PREA event log under "comp education completed" section.

	<p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency maintains documentation of confined person participating in PREA education sessions. <p>A random sampling of confined person files revealed that confined persons sign acknowledgments after receiving orientation and education materials. Documentation is also maintained in the detention management system using the PREA event log.</p> <p>115.33(e):</p> <p>The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 3) establishes; This information and education will be disseminated in a variety of ways to include:</p> <ol style="list-style-type: none"> a) Issuance of the inmate PREA education pamphlet and notification of information included in the Inmate Rules and Information Packet as outlined in jail policy 351.1 Intake Process and 354.2 Intake Process; Huber Facility. b) Informational postings throughout the facilities. <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency ensures that key information about the agency's PREA Policy is continuously and readily available or visible through posters, confined person handbooks, or other written formats. <p>During the Site review, this auditor observed signage throughout the facility providing options for reporting sexual abuse and sexual harassment as well as educational materials regarding PREA.</p> <p>Informal conversations with staff and confined persons confirmed PREA pamphlets are provided to each confined person that they are able to retain them. They reported PREA information is available on kiosks located in housing units and on tablets issued to confined persons.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.34	Specialized training: 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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. PREA Staff Training Curriculum

d. PREA Specialized Training Investigating Sexual Abuse in Correctional Settings

2. Interviews

a. Facility Investigator

3. Site Review Observations:

a. Observations during on-site review of physical plant

Findings:

115.34 (a-c):

The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 (p. 7) establishes, The sexual abuse incident will be turned over to the Waukesha County Sheriff's Department and investigated by personnel who are trained in sexual abuse investigations in a correctional setting.

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The responses provided on the Facility PAQ indicated:

1. Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.
2. In addition to the general training provided to all employees pursuant to §115.231, the agency ensure that its investigators receive training in conducting such investigations in confinement settings.
3. The agency maintains documentation showing that investigators have completed the required training.
4. 21 investigators are currently employed who have completed the required training.

During the on-site audit, the Facility provided this auditor with training certificates for staff that completed NIC specialized training titled "PREA- Investigating Sexual Abuse in a Correctional Setting" in addition to the general PREA training provided to all employees. The course curriculum was reviewed and found to meet the requirements of this standard.

The auditor interviewed a Facility Investigator. He confirmed he completed the Specialized training in addition to the general PREA training provided to all employees. He reported that the training covered 1) techniques for interviewing sexual abuse victims; 2) proper use of Miranda and Garrity warnings; 3) Sexual abuse evidence collection in confinement settings; and 4) criteria and evidence required to substantiate a case for administrative action or prosecution referral.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.35	Specialized training: Medical and mental health care
	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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06
 - e. Medical/mental health staff training records
2. Interviews:
 - a. Medical and Mental Health staff
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.35(a-d):

The Facility indicated compliance with this provision and provided PREA Policies in its PAQ. The Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (p.3) establishes;

6.1. Upon hire, and annually thereafter, Wellpath employees receive training and instruction that relates to the prevention, detection, response, and investigation of staff-on-patient and patient-on-patient sexual abuse, as well as how to preserve physical evidence of sexual abuse. This training is an adjunct to the initial and ongoing training provided by the facility.

6.2. Training includes, but is not limited to:

6.2.1. Delineation of health care staff's role in the facility's sexual abuse policy and procedures

6.2.2. Role-specific training in the detection and assessment of sexual abuse

6.2.3. Effective and professional response to victims and abusers

6.2.4. Preservation of physical evidence

6.2.5. How to elicit, receive, and forward reports of allegations or suspicions of sexual abuse

6.2.6. Confidentiality requirements

6.2.7. Documentation of training content and attendance will be maintained.

Waukesha County Sheriff's Department Policy and Procedure 351.1 (p. 5) establishes; Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated regarding the Department's zero tolerance for sexual misconduct. Sexual misconduct on the part of staff members includes sexual harassment, abuse, over-familiarity and retaliation.

Staff Response Training. Waukesha County Jail correctional, support staff, contractors, and volunteers will be educated on what they can do to prevent, detect and respond to inmate sexual harassment and/or abuse.

Contractors/Volunteers. Training will be provided to all contractors and volunteers members related to their particular job duties.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities.

2. The number of medical and mental health care practitioners who work regularly at the facility and have received the training required by policy is 34.

	<p>3. The agency medical staff at this facility do not conduct forensic medical exams.</p> <p>4. The agency maintains documentation showing that medical and mental health practitioners have completed the required training.</p> <p>Review of training records for medical and mental health staff revealed that the training was completed as mandated by policy.</p> <p>During the on-site audit, medical and mental health care staff were interviewed. They confirmed that in addition to the PREA training that all staff participate in, additional training is required for medical and mental health workers. They confirmed that medical staff at the facility do not conduct forensic examinations.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.41	Screening for risk of victimization and abusiveness
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Waukesha County Sheriff's Department/Jail Policy and Procedure 351.1 d. Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 e. Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2 f. Referral for support services 2. Interviews <ol style="list-style-type: none"> a. Staff responsible for risk screening (Intake staff, Supervisors, Classification staff) b. PREA Coordinator c. Random Confined persons 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.41 (a-c):</p> <p>The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 (p. 1) establishes,</p> <p>All inmates admitted and processed into the Waukesha County Jail and Huber Facility will be assessed utilizing the PREA Screening Form in order to identify any risk of sexual harassment or abuse by other inmates (victim) or any risk of being sexually abusive toward other inmates (perpetrator).</p>

The responses provided on the Facility PAQ indicated:

1. The agency has a policy that requires screening upon admission to a facility or transfer to another facility for risk of sexual abuse victimization or sexual abusiveness toward other confined persons.
2. Policy requires that confined persons be screened for risk of sexual victimization or risk of sexually abusing other confined persons within 72 hours of their intake.
3. 2058 confined persons entered the facility in the past 12 months and that 2058 confined persons were screened within 72 hours.
4. Reported that risk assessment is conducted using an objective screening instrument.

During the on-site audit staff responsible for risk screening and random confined persons were interviewed. Staff responsible for risk screening reported that they conduct a risk screening on individuals coming into the facility, the same day they arrive and always within 24 hours of their arrival using a PREA Screening form. Random confined persons reported that they were asked questions from the risk screening as soon as they entered the facility.

During the Site review this auditor observed an intake of a confined person. Staff use a standardized PREA Screening form to complete the screening. The risk assessment tool was reviewed and found to be objective and ask a series of yes or no questions. Staff explains to the confined person the purpose of the screening and indicated some of the questions are personal, but all information is confidential. Informal conversations with confined persons revealed that intakes are done immediately upon the confined person's arrival in the intake area where there is privacy. The auditor reviewed a random sample of confined person records which corroborated the screening is completed on the day of arrival at the facility.

115.41(d-e):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 (p. 5) establishes;

B) PREA Screening Form- Officers. The PREA Screening Form will be completed as follows:

1. Reason for Screening
 - a. New Incoming: all new incoming prisoners at both the County Jail and Huber Facility.
 - b. Transfer: all inmates transferring between the County Jail and Huber Facility.
2. Is this inmate currently incarcerated for sex offense? (Predator Factor) Check (Yes) if so, (No) if not.
3. Is this inmate currently incarcerated for a violent offense? (Predator Factor) Check (Yes) if so, (No) if not.
4. If this inmate is a female, does she display an overtly masculine appearance? (Predator Factor) Check (Yes) if so, (No) if not, (Not Applicable-Inmate is a Male) if male.
5. Does this inmate appear to be of larger build and/or physical strength? (Predator Factor) Check (Yes) if so, (No) if not.

6. Is the inmate under 25 years old? (Victim Factor) Check (Yes) if so, (No) if not.
7. Is the inmate over 65 years old? (Victim Factor) Check (Yes) if so, (No) if not.
8. If male, is this inmate less than 5', 6" and/or less than 140 LBS.? (Victim Factor) Check (Yes) if so, (No) if not, (Not Applicable-Inmate is a female) if female.
9. If female, is this inmate less than 5' and/or less than 100 LBS.? (Victim Factor) Check (Yes) if so, (No) if not, (Not Applicable-Inmate is a Male) if male.
10. Inmate reports or displays obvious developmental or physical disability and/or mental illness. (Victim Factor) Check (Yes) if so- and explain, (No) if not.
11. Is this the inmate's first incarceration? (Victim Factor) Check (Yes) if so, (No) if not.
12. Is this inmate detained solely for civil/immigration purposes? (Victim Factor) Check (Yes) if so, (No) if not.
13. Does this inmate report being gay/lesbian/bi-sexual/intersex or transgender or display a physical appearance, attributes, or personal belongings that do not conform to conventional gender roles? (Victim Factor) Check (Yes) if so- and explain, (No) if not.
14. Does this inmate report he/she has been the victim or previous sexual abuse or victimization? (Victim Factor) Check (Yes) if so, (No) if not.
15. Does this inmate report concerns for safety in regards to being in jail? (Victim Factor) Check (Yes) if so- and explain, (No) if not.

C) PREA Screening Form- Supervisors. (New Incoming Only)

1. Has this inmate displayed prior acts of sexual abuse? (Predator Factor) Query CCAP. Check (Yes) if so, (No) if not.
2. Does this inmate have a history of institutional sexual assault/abuse behavior? (Predator Factor) Query the detention management system. Check (Yes) if so, (No) if not.
3. Does this inmate have prior conviction(s) for violent offenses(s)? (Predator Factor) If prior convictions for violent offenses exist check (Yes) if so, (No) if not.
4. Does this inmate have a history of prior institutional violence? (Predator Factor) Query the detention management system. Check (Yes) if so- and explain, (No) if not.
5. Based upon a review of predator factors on the officers and supervisors PREA screening form, a predator designation is identified as (check appropriate):
 - a. Known Predator (If yes to current incarceration for sexual offense)
 - b. Potential Predator (if yes to 3 or more questions relative to predator factors)
 - c. Non-Predator (No applicable factors identified)
6. Has this inmate exhibited a history of inappropriate sexual activity while incarcerated? (Victim Factor) Check (Yes) if so- and explain, (No) if not.
7. Is this inmate's criminal history exclusively non-violent? (Victim Factor) Check (Yes) if so, (No) if not- and explain.
8. Does this inmate have any prior sex offenses against an adult or child? (Victim Factor) Check (Yes) if so- and explain, (No) if not.
9. Based upon a review of victim factors on the officers and supervisors PREA screening form, a victim designation is identified as (check appropriate):
 - a. Known Victim (If inmate has reported he/she has been the victim of previous sexual abuse or victimization)
 - b. Potential Victim (If yes to 3 or more questions relative to victim factors)

c. Non-Victim (No applicable factors identified)

d. The risk assessment tool shall consider, at a minimum, the following criteria to assess

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Staff responsible for risk screening: were interviewed and reported that the PREA Screening form is used during the intake screening process and that it included all the required elements outlined in this standard. The auditor reviewed the PREA Risk Assessment Tool and found it considers all criteria as outlined in the standard and policy.

115.41(f-g):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2 (p. 3) establishes;

The PREA Screening Form will be reviewed and will assist in identifying individuals who are at risk of sexual victimization or abuse. Any other additional relevant information received since the intake screening will also be utilized. This information will be used as a complement to the overall classification process.

The responses provided on the Facility PAQ indicated:

1. Policy requires that the facility reassess each confined person's risk of victimization or abusiveness with a set time period, not to exceed 30 days after the confined person's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening.
2. Inmates entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more and who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake.
4. Policy requires that a confined person's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse or receipt of additional information that bears on the confined person's risk of sexual victimization or abusiveness.

Interviews with staff responsible for risk screening (classification staff) reported that a reassessment of confined persons occurs within 30 days of their initial assessment. The reassessment questionnaire is completed during a face-to-face interview with a classification staff. A confined person's risk level will also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information. During random confined person interviews, most recalled being asked PREA questions at intake and again during the reassessment.

The auditor reviewed a random sample of confined person records which corroborated those confined persons whose length of stay was for 30 days had received a reassessment screening within 30 days of their arrival.

115.41(h):

The responses provided on the Facility PAQ indicated:

1. Policy prohibits disciplining confined persons for refusing to answer (or for not

	<p>disclosing complete information related to) the questions regarding: (a) whether or not the confined person has a mental, physical, or developmental disability; (b) whether or not the confined person is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) Whether or not the confined person has previously experienced sexual victimization; and (d) the confined person's own perception of vulnerability.</p> <p>Interviews with staff responsible for risk screening stated that confined persons would not and have never been disciplined for refusing to answer any of the questions on the risk screening.</p> <p>115.41(i): The Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 (pp. 1-2) establishes, Any information related to sexual victimization or abuse that occurred in an institutional setting will be limited to medical and mental health staff and other staff only as necessary to address treatment plans and security and management decisions, including housing, classification, work, education, and program assignments, or as otherwise required by Federal, State, or local law.</p> <p>During the on-site audit the PREA Coordinator and staff responsible for risk screening were interviewed. The PREA Coordinator reported that access to a confined person's risk assessment is limited to those requiring the information to make housing, work assignment, and programming/education decisions. The PREA screening process is computerized and only authorized staff have access. Staff were aware this information is confidential and not to be shared or used for any non-program purpose.</p> <p>During the site review, the auditor observed that computers access is strictly controlled, and staff only have access to files that are related to their specific assignments. All computers have lock-screens that require staff to enter a password to activate.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12

- d. Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2
- e. Waukesha County Sheriff's Department/Jail Policy and Procedure 362.9
- c. PREA Risk Assessments
- d. Referral for support services

2. Interviews

- a. PREA Coordinator
- b. Staff responsible for risk screening
- c. Confined persons identified as LGBTI

3. Site Review Observations:

- a. Observations during on-site review of physical plant

Findings:

115.42 (a-b):

The Facility indicated compliance with this provision and provided multiple Agency Policies that address this standard in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2 (p. 3) establishes;

The PREA Screening Form will be reviewed and will assist in identifying individuals who are at risk of sexual victimization or abuse. Any other additional relevant information received since the intake screening will also be utilized. This information will be used as a complement to the overall classification process.

The classification unit will ensure the inmate is transferred to the appropriate housing unit. Housing transfers will be reviewed prior to inmate movement to ensure keep separate requirements are maintained; and/or any long or short term special needs have been addressed and provided for.

The determining factors regarding whether inmates will be assigned to a restricted, medium, direct supervision or close custody status are inmate confinement history, past and present institutional disciplinary history, demeanor, attitude, adjustment, special needs and severity of past and present charges. No one factor is paramount; the decision will be based on the totality of the factors and the classification unit's perspective. Decisions made and recommendations issued by classification officers require the approval of the classification supervisor.

The Waukesha County Sheriff's Department/Jail Policy and Procedure 351.2 (p. 2) establishes;

If the inmate indicates they have experienced prior sexual victimization whether it occurred in an institutional setting or in the community, a follow-up meeting with a medical or mental health staff person will be offered within 14 days of the intake PREA screening.

The responses provided on the Facility PAQ indicated:

1. The facility uses information from the risk screening guide required by 115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those confined persons at high risk of being sexually victimized from those at high risk of being sexually abusive.
2. Reported that the facility makes individualized determinations about how to ensure the safety of each confined person.

During the onsite audit, this auditor interviewed the PREA Coordinator and Staff responsible for risk screening. The PREA Coordinator reported that confined persons

who score “at risk,” for victimization or abuse are referred for medical and/or mental health assessments as required and are tracked. The classification supervisor is responsible for reviewing each assessment to ensure proper completion and to ensure potential victims and abusers are housed separately. Staff responsible for risk screening reported that when confined persons are identified as being at risk, a referral is made for a mental health assessment which they have the option of declining. The mental health referral is documented as well as the confined person's acceptance or refusal. Risk assessments are used to ensure that confined persons are housed appropriately to ensure their safety by keeping separate those confined persons at high risk of being sexually victimized from those at high risk of being sexually abusive.

115.42 (c-e):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.9 establishes;

It is the policy of the Waukesha County Sheriff's Department Jail Division to establish procedures for the intake, housing and medical treatment of transgender inmates. A transgender inmate will be assigned housing by the classification unit based on the inmate's gender identification, housing availability and safety/security needs. Subsequent reviews of housing and classification status for each transgender inmate will be made at least twice each year to review any threats to safety experienced by the inmate.

The responses provided on the Facility PAQ indicated:

1. In deciding whether to assign a transgender or intersex confined person to a facility for male or female confined persons, the agency shall consider on a case-by-case basis whether a placement would ensure the confined person's health and safety.
2. In making housing and programming assignments, the facility shall consider on a case-by-case basis whether a placement of a transgender or intersex confined person would present management or security problems.

The PREA Coordinator reported placement and programming assignments for each transgender or intersex inmate would be reassessed at least twice each year to review any threats to safety experienced. A transgender or intersex confined person's own view are given serious consideration with respect to his or her own safety.

Staff responsible for classification reported confined persons who identify as transgender or intersex are asked if they feel safe or have any concerns regarding their placement. The opinion of the confined person is given serious consideration as it relates to their assignments.

There were two transgender or intersex confined persons at the facility during the onsite audit and both were interviewed. They stated they felt safe and had no issues regarding their housing.

115.42(f):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2(p. 2) establishes; Transgender inmates will be provided the opportunity to disrobe, shower,

and dress apart from other inmates. Separate showers will be accomplished either through physical separation (e.g. separate shower stalls) or by time-phasing or scheduling (e.g. allowing the inmate to shower before or after others).

The PREA Coordinator reported that transgender confined persons at the facility are given the opportunity to shower separately. During interviews with Transgender confined persons they confirmed they were allowed to shower separately.

During the site review, this auditor reviewed shower rooms. They had single shower stalls and shower curtains allowing all confined persons to shower separately and privately.

115.42(g):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 362.2(p. 2) establishes; Lesbian, gay, bisexual or transgender inmates will not be placed in dedicated units solely on the basis of such identification or status, unless the 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 Jail Administrator reported that they are not under any type of consent decree, legal settlement, or legal judgment and that LGBTI confined persons are not placed in dedicated facilities, units, or wings based solely on the basis of their identification.

This auditor interviewed three confined persons that identified as LGBTI. They reported they felt safe at the facility and are housed in the same pods as other confined persons.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.43	Protective Custody
	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.) a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 2. Interviews a. Jail Administrator b. Staff who Supervise Inmates in Segregated Housing 3. Site Review Observations: a. Observations during on-site review of physical plant

Findings

115.43(a-e):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 351.12 (p. 3) establishes;

Inmates determined to be at high risk for sexual victimization will not be placed in involuntary administrative segregation (not at the inmate's request) unless an assessment of all available alternatives has been made and a determination has been made there is no available alternative means of separation from likely abusers. If the assessment cannot be made immediately, the inmate will be placed in administrative segregation for less than 24 hours while the assessment is being completed.

1. Temporary until assessment. Inmates in administrative segregation for this purpose will have access to programs, privileges, education and work opportunities to the extent possible. If access is restricted to programs, privileges, education, and work opportunities, the fact that opportunities have been limited, the duration of the limitation, and the reason for the limitations will be documented by the assigned supervisor during weekly segregation review (SGR).

2. Administrative Segregation - Initial. A high-risk inmate will be assigned to administrative segregation only until an alternative means of separation from likely abusers can be arranged, not to exceed a period of 30 days unless exigent circumstances exist.

3. Documentation. If an initial administrative segregation housing assignment is made, an event log will be created by the classification unit to document the basis for the concern for the inmate's safety; and the reason why no alternative means of separation can be arranged.

4. The initial administrative segregation status will be reviewed weekly to determine whether there is a continuing need for separation from the general population.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers.

2. The number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero.

3. In the past 12 months, the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement was zero.

4. If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.

During the on-site audit the Jail Administrator and Staff who Supervise Inmates in Segregated Housing were interviewed. The jail Administrator reported that inmates are not placed involuntarily segregated housing because they are at high risk of

	<p>victimization unless there are no other alternatives. Staff members assigned to the Seg stated that there haven't been any inmates placed in the unit because they are at high risk for sexual victimization. Staff reported that there is protocol that would be followed regarding the programs and privileges that would be available to them. There were no confined persons in segregated housing because of risk of sexual victimization at the time of the onsite to interview.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.51	Inmate reporting
	<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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Confined person Reporting Options Poster (English and Spanish) d. PREA Pamphlet (English and Spanish) e. Agreement with Dane County 2. Interviews <ol style="list-style-type: none"> a. PREA Coordinator b. Random staff c. Random confined persons 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.51 (a):</p> <p>The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(pp. 4-5) establishes;</p> <p>Inmates may confidentially disclose incidents of sexual abuse or harassment to any staff member, either verbally or in writing. Inmates at both the County Jail and Huber Facility have the ability to use the inmate telephone system to report allegations of sexual abuse/harassment. The general public also has the ability to speak to a supervisor to report allegations of sexual abuse/harassment on behalf of an inmate.</p> <p>Instructions and information regarding the PREA hotline are posted in the County Jail and Huber Facility lobbies, along with being posted in all inmate housing units and zones.</p> <p>The responses provided on the Facility PAQ indicated:</p>

1. The agency has established procedures allowing for multiple internal ways for confined persons to report privately to agency officials about sexual abuse or sexual harassment, retaliation by staff or other confined persons and staff neglect or violation of responsibility that may have contributed to such incidents.

During the onsite portion of this audit, random staff and random confined persons were interviewed. Staff interviewed were all familiar with multiple ways for confined persons to privately report sexual abuse, sexual harassment, retaliation or staff neglect that may have contributed to such incidents. When asked, staff were able to articulate different ways available to report. Confined persons interviewed provided examples of internal ways to privately report sexual abuse, sexual harassment, retaliation or staff neglect that may have contributed to such incidents. The most common response was to report to staff.

During the Site review this auditor observed signage regarding reporting throughout the facility in English and Spanish. The signage was consistent throughout the facility. The signage outlined multiple ways for confined persons to make reports. The PREA Pamphlet was also reviewed and contained reporting options. Telephones in common areas were tested and found to be operable. Hotline numbers were tested and found to be operable.

115.51(b):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

Anonymous Inmate Call

An inmate may use the housing unit inmate phone system and dial *888.

An e-mail will automatically be sent to the jail command staff notifying the on-duty supervisor a PREA hotline call was placed at either the County Jail or Huber Facility. The phone call will also be transferred automatically to an outside agency. The outside agency will then contact the on-duty supervisor to inform them of the call.

The responses provided on the Facility PAQ indicated:

1. The agency provides at least one way for confined persons to report abuse or harassment to a public or private entity that is not a part of the agency.

The PREA Coordinator was interviewed and stated that the facility provides confined persons contact information on how to report abuse or harassment to an office that is not part of the agency. They can dial 888 on the inmate phone system and can remain anonymous upon request.

Confined persons interviewed stated that they were aware of multiple ways to make a report, including outside entities. The most common response for external reporting was to call local law enforcement.

115.51(c):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

	<p>The staff person who receives information regarding the potential of sexual harassment or abuse of an inmate, will immediately report the incident to an on duty supervisor and prepare and forward a report. All allegations of sexual abuse, including third-party and anonymous reports, will be reported to the detective bureau.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. 2. Staff are required to document verbal reports immediately. <p>The facility provided an example of a confined person making a verbal allegation of sexual harassment to a staff member. The documentation indicated the verbal report was accepted, documented and investigated. Staff interviewed all stated that they would accept both verbal and written reports from confined persons. Verbal reports would be documented immediately and reported to their supervisor.</p> <p>Confined persons interviewed were aware they could make a verbal and/or written report to any staff member.</p> <p>115.51(d): The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency has established procedures for staff to privately report sexual abuse and sexual harassment of confined persons. 2. Staff are informed of these ways through policy and training. <p>Staff interviewed reported that they were aware of several methods for reporting sexual abuse and sexual harassment of confined persons. Staff also gave several examples that they were aware of, including hotline numbers for staff as well as making reports directly to their supervisor.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. WSD/Jail Division Policy and Procedure 353.4 c. WCJ Rules and Handbook

2. Interviews

- a. PREA Coordinator
- b. Grievance Coordinator

3. Site Review Observations:

- a. Observations during on-site review of physical plant

115.52(a):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The response provided on the Facility PAQ indicated the agency has an administrative procedure for dealing with confined person grievances regarding sexual abuse. The PREA Policies outlines the administrative procedures to address confined person grievances regarding sexual abuse.

The auditor has determined that the agency is not exempt from this provision as it has administrative procedures for dealing with confined person grievances regarding sexual abuse.

115.52(b-c):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

Grievances Regarding Alleged Incidents of Sexual Harassment or Abuse.

- a) Attempts at informal resolution will not be required of an inmate reporting an alleged incident of sexual abuse.
- b) There is no time limit regarding when an inmate may submit a grievance regarding an allegation of sexual abuse.
- f) An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and the grievance will not be referred for action to a staff member who is the subject of the complaint.

The responses provided on the Facility PAQ indicated:

- 1. The agency policy allows a confined person to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred.
- 3. Agency policy and procedure allows a confined person to submit a grievance alleging sexual abuse without submitting it to the staff member who is the submit of the complaint.
- 4. A confined person grievance alleging sexual abuse is not referred to the staff member who is the subject of the complaint.

During the on site audit, the Grievance Coordinator was interviewed. He reported that there is no time limit established for grievances alleging sexual abuse or sexual harassment.

115.22(d):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 353.4(p.5) establishes;

Each grievance will be answered in writing within five (5) calendar days of receipt of the grievance.

The responses provided on the Facility PAQ indicated:

1. Agency policy and procedure require that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance.
2. In the past 12 months there were five grievances filed that alleged sexual abuse.
3. In the past 12 months, there were five grievances alleging sexual abuse that reached final decision within 90 days after being filed.
4. In the past 12 months, there were zero grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days:

During an interview with the PREA Coordinator, he confirmed there were five grievances filed that alleged sexual abuse and all reached a decision within 90 days of filing.

115.252(e):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

Third parties, including other inmates, staff members, family members, attorneys and outside advocates are permitted to assist inmates in filing grievances relating to allegations of sexual abuse and will also be permitted to file grievances/complaints on behalf of inmates.

If a third party files a grievance/complaint on behalf on an inmate, the alleged victim must agree to have the request filed on his or her behalf. If the inmate declines to have the request processed on his or her behalf, the grievance/complaint will be closed out with documentation of the inmate's decision.

The responses provided on the Facility PAQ indicated:

1. Agency policy permits third parties, including fellow confined persons, staff members, family members, attorneys, and outside advocates to assist confined person in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of confined persons.
2. Policy requires that if a confined person declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the confined person's decision to decline.
3. There were zero grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline:

During the on-site tour of the facility, Signage was observed posted in public areas of the facility with information relating to third party reporting.

115.52(f):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

If a grievance or complaint is submitted alleging an inmate is subject to a substantial risk of imminent sexual abuse, the initial response will be immediate as it relates to corrective action for the inmate's safety.

The initial response and final decision will be documented to include the

determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy and established procedures for filing an emergency grievance alleging that a confined person is subject to a substantial risk of imminent sexual abuse.
2. The agency has a policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours.
3. There were zero emergency grievances alleging substantial risks of imminent sexual abuse filed in the past 12 months.
4. The agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days.

Interview with PREA Coordinator confirmed that there have been no emergency grievances filed in the past 12 months.

115.52(g):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;

The inmate may be disciplined for filing a grievance related to alleged sexual abuse only where the jail demonstrates that the inmate filed the grievance frivolously or in bad faith

The responses provided on the Facility PAQ indicated:

1. The agency has a written policy that limits its ability to discipline a confined person for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the confined person filed the grievance in bad faith.
2. In the past 12-months there have been zero confined person grievances alleging sexual abuse that resulted in disciplinary action.

During Interview with the PREA Coordinator, he confirmed there were no grievances filed that a that resulted in disciplinary action. He further stated confined persons would not be disciplined for filling a grievance alleging sexual abuse unless it was determined to be filed in bad faith.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.53	Inmate access to outside confidential support services
	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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Waukesha County Guideline for Responding to Sexual Assault
 - d. Confined person PREA Pamphlet
2. Interviews
 - a. PREA Coordinator
 - b. Random confined persons
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

115.53 (a-c):

WSD policy and procedure 361.12 and the Waukesha County Guideline for Responding to Sexual Assault were reviewed and address the requirements of this standard. The procedure states Inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse. The PREA Pamphlet informs inmates to contact mental health or medical staff and they will arrange support services

The responses provided on the Facility PAQ indicated:

1. The facility provides confined persons access to outside victim advocates for emotional support services related to sexual abuse.
2. The facility provides confined persons with access to such services by giving confined persons mail addresses and telephone numbers for local, state or national victim advocacy or rape crisis organizations.
3. The facility provides confined persons with access to such services by enabling reasonable communication between confined persons and these organizations in as confidential a manner as possible.
4. The facility informs confined persons, prior to giving them access to outside support services, of the extent to which such communications will be monitored.
- 5 The facility informs confined persons, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state or local law.

During the on-site audit, random confined persons were interviewed. Most confined persons interviewed stated that they were aware that advocacy services existed. Confined persons stated information about advocacy services was provided. Confined persons stated that they believed that these services would be private and confidential.

The facility detains persons solely for civil immigration purposes. During the site review, signage was observed throughout the facility which provided confined persons mailing addresses and telephone numbers for immigrant services agencies for persons detained solely for civil immigration purposes. The auditor tested the 24-hour crisis hotline number for the Women's Center and services were confirmed.

	<p>The Waukesha County Sheriff Department is a partner with the Waukesha County's Sexual Assault Response Team (SART). The Women's Center also a part of SART, provides county wide services including the Waukesha County Jail. The Women's Center provides a 24-hour crisis line, Crisis Intervention, Hospital accompaniment, Law enforcement accompaniment, Systems advocacy, Peer support groups and/or individual counseling, including therapy referrals as needed.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.54	Third-party reporting
	<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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. WCJ website 2. Interviews <ol style="list-style-type: none"> a. PREA Coordinator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>115.54 (a):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(pp. 5-6) establishes;</p> <p>"PREA Hotline- Inmates at both the County Jail and Huber Facility have the ability to use the inmate telephone system to report allegations of sexual abuse/harassment. The general public also has the ability to speak to a supervisor to report allegations of sexual abuse/harassment on behalf of an inmate. Instructions and information regarding the PREA hotline are posted in the County Jail and Huber Facility lobbies, along with being posted in all inmate housing units and zones. b) General Public Call 1. Postings in both the County Jail and Huber Facility lobbies will provide members of the general public instructions for using the County Jail and Huber Facility automated phone menu system to reach a supervisor to report allegations of sexual abuse/harassment on behalf of an inmate.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency provides a method to receive third-party reports of confined person sexual abuse or sexual harassment. 2. The agency publicly distributes information on how to report confined person

	<p>sexual abuse or sexual harassment on behalf of confined persons through the agency website and posting in the facility. at www.geogroup.com/PREA.</p> <p>During the onsite audit the PREA Coordinator was interviewed. He reported that there were no third-party reports of sexual abuse or sexual harassment of a confined person during the past 12 months.</p> <p>During the site review, this auditor observed signage regarding third party reporting posted in public areas around the facility, including the visiting area and front lobby. The auditor also reviewed the Agency website and found information on third party reporting.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 2. Interviews <ol style="list-style-type: none"> a. Jail Administrator b. Random staff c. PREA Coordinator d. Medical/Mental Health Staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.61 (a-b):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12(pp.5, 6 &8) establishes:</p> <p>Any staff member who has information regarding an actual or potential incident regarding inmate sexual harassment or abuse will report the matter in a timely and appropriate manner to an on duty supervisor. The staff person who receives information regarding the potential of sexual harassment or abuse of an inmate, will immediately report the incident to an on duty supervisor and prepare and forward a report.</p> <p>a) Reporting staff will not reveal any information related to a sexual harassment or</p>

abuse report to anyone other than to the extent necessary as outlined in jail or department policy to make treatment, investigation and other security and management decisions.

All staff will immediately report any knowledge, suspicion or information regarding retaliation against staff or inmates who reported an incident and will immediately report any staff neglect or violation of responsibilities that may have contributed to an incident of retaliation by another.

The responses provided on the Facility PAQ indicated:

1. The agency requires all staff to report immediately any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not is part of the agency.
2. The agency requires all staff to report immediately and according to agency policy retaliation against confined persons or staff who reported such an incident.
3. The agency requires all staff to report immediately and according to policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

During the on-site audit, random staff were interviewed. Staff interviewed all stated that they were aware of agency policy that required them to immediately report any knowledge or suspicion of sexual abuse, sexual harassment or retaliation of confined persons, including any employee neglect or violation of responsibilities that may have contributed to an incident. Staff interviewed understood that information related to sexual abuse and sexual harassment remain confidential except to the designated supervisors that they report the incident to.

115.61(c-d):

Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (pp. 3-4) establishes:

- 6.3. Employees, regardless of title, have a duty to report any sexual contact, sexual abuse, sexual threat, staff voyeurism, or information regarding inappropriate relationships between an employee and a patient. Such duty to report will include any allegations, knowledge, or reasonable belief regarding such conduct.
 - 6.3.1. At the initiation of services with medical or mental health providers, all patients are informed of this duty to report.
- 6.4. Whenever an employee knows, suspects, or receives an allegation from any source regarding patient sexual abuse, the employee will immediately notify the Responsible Health Authority (RHA) / Health Services Administrator (HSA), and Facility Administrator.
- 6.5. All information related to sexual victimization or abusiveness that occurred in the institutional setting will be strictly limited to health care staff and other staff to inform treatment plans and security/management decisions, as required by federal, state, and local law.
- 6.6. Consent of the patient, 18 years of age or older, is required before reporting an incident of sexual abuse that occurred prior to incarceration, except when the incident occurred in another correctional institution or in the event that the patient is under 18 years of age, as permitted by law.

	<p>During the on-site audit, Medical and Mental Health staff, the Jail Administrator and PREA Coordinator were interviewed. The Medical and mental Health staff confirmed their duty to report and that inmates are informed of their duty to report and the limitations of confidentiality at the start of their appointment. Both the medical and mental health staff stated that they have not had an occasion to report such an incident.</p> <p>The PREA Coordinator stated that unless precluded by federal, state or local law, medical and mental health practitioners are required to report allegations of sexual abuse for alleged victims under the age of 18 or considered a vulnerable adult to designated state or local services agencies under applicable mandatory reporting laws.</p> <p>The Facility Director stated that any abuse of vulnerable adults would be reported to the appropriate agencies and that they would receive the same services available to all inmates.</p> <p>115.61(e):</p> <p>The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes;</p> <p>All allegations of sexual abuse, including third-party and anonymous reports, will be reported to the detective bureau unless the allegation is proven unfounded.</p> <p>The Facility Administrator stated that all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports are reported to the facility's designated investigators.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.62	Agency protection duties
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 2. Interviews <ol style="list-style-type: none"> a. Agency Head b. Jail Administrator c. Random staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant

	<p>Findings 115.62(a): The Facility indicated compliance with this provision and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes; If a grievance or complaint is submitted alleging an inmate is subject to a substantial risk of imminent sexual abuse, the initial response will be immediate as it relates to corrective action for the inmate's safety.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. When the facility learns that a confined person is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the confined person. 2. In the past 12-months there were zero instances where a confined person was subject to a substantial risk of sexual abuse. <p>During the on-site audit, the Agency Head, Jail Administrator and random staff were interviewed. The Agency Head reported that WCJ takes immediate action to protect the victim from further harm and refer him or her for necessary services (medical, mental health, etc.). The Jail Administrator reported that the confined person would immediately be separated from other confined persons and would determine the most appropriate action to take to protect the confined person. Staff interviewed all stated that if they became aware that a confined person was in imminent danger of sexual abuse that they would immediately separate the confined person and report to their supervisor or the PREA Coordinator to determine next steps.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.63	Reporting to other confinement facilities
	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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 2. Interviews <ol style="list-style-type: none"> a. Agency Head b. Jail Administrator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings 115.63(a-d):</p>

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 6) establishes:

Upon receiving an allegation an inmate was sexually abused while confined to another facility, the jail administrator or designee will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. This notification will be provided as soon as possible but no more than 72 hours after receiving the report and this notification will be documented as an addendum to the initial report.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy requiring that, upon receiving an allegation that a confined person was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred.
2. In the past 12 months there were zero allegations the facility received that a confined person was abused while confined in another facility.
3. The agency policy also requires the facility head to provide such notification as soon as possible but no later than 72 hours after receiving the allegation.
4. The agency or facility documents that it has provided such notification with 72 hours of receiving the allegation.
5. The agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards.
6. In the past 12 months there was one allegation of sexual abuse the facility received from other facilities.

During the on-site audit, the Agency Head and Jail Administrator was interviewed. The Agency Head reported that if another facility or agency refers allegations of sexual abuse or sexual harassment that occurred at WCJ, the PREA allegations would be reported to the PREA Coordinator and investigated.

The Jail Administrator confirmed that if information was received that a confined person had been sexually abused at another facility, she would immediately notify the director of that facility. She also stated that the allegations would be documented no later than 72 hours after receiving the notification. She stated that if WCJ received notification from another facility that a confined person had been abused while at this facility, she would ensure that an investigation was conducted according to PREA protocols. She confirmed that there were no allegations by confined persons of sexual abuse occurring in another facility, and there was one report received from another facility regarding a confined persons alleging sexual abuse at this facility. This allegation was investigated.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.64	Staff first responder duties
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	Auditor Overall Determination: Meets Standard
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Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Documents: (Policies, directives, forms, files, records, etc.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
2. Interviews
 - a. Random staff
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings

115.64(a):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 7) establishes:

The first security staff member (correctional officer or supervisor) learning of an allegation that an inmate was sexually abused will immediately ensure:

- a) The inmate/victim is moved to a safe, not isolated, place.
- b) The alleged perpetrator is placed in administrative segregation pending investigation.
- c) If known, the alleged crime scene will be secured.
- d) Any identified or suspected victim or perpetrator of a sexual abuse will not be allowed to shower, drink anything, change clothes, smoke, urinate, defecate, eat, clean themselves or brush their teeth. Any item that may have touched the perpetrator (e.g. tissue or towel) or anything else left behind will be secured.
- e) Correctional staff will assist investigating personnel as required i.e. arrange transportation to a medical facility for examination, collect/contain evidence, etc.

The responses provided on the Facility PAQ indicated:

1. The agency has a first responder policy for allegations of sexual abuse.
2. The policy requires that upon learning that a confined person was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser.
3. Policy requires that upon learning of an allegation that a confined person was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
4. Reported that policy requires that upon learning of an allegation that a confined person was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to request that the alleged victim not take any actions that could destroy physical evidence, including as appropriate, washing, brushing teeth, changing clothes, smoking, drinking or eating.
5. Policy requires that, upon learning of an allegation that a confined person was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to 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.

6. That In the past 12 months, there were six allegations that a confined person was sexually abused.

7. Of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was one.

8. That in the past 12 months the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence was three.

9. In the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence was one.

10. The number of times the first security staff member to respond to the report requested the alleged victim to not take any actions that could destroy physical evidence was zero.

10. The number of times the first security staff member to respond to the report requested the alleged abuser to not take any actions that could destroy physical evidence was zero.

During the on-site audit, Random staff (all staff are first responders) were interviewed. Staff interviewed understood their responsibilities as it relates to reporting to the scene of an alleged sexual abuse and were able to articulate the steps they would take.

115.64(b):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 7) establishes:

If the first individual made aware of the allegation is not a security staff member (i.e. food service, medical/mental health staff, volunteer), they are required to request the alleged victim not take any actions that could destroy physical evidence, and then immediately notify security staff.

The responses provided on the Facility PAQ indicated:

1. The agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence.
2. The agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to notify security staff.
3. Of the allegations that an inmate was sexually abuse in the past 12 months, the number of times a non-security staff member was the first responder was zero.

Interviews with random staff indicated all staff interviewed stated that they received the same training as it relates to responding to sexual abuse allegations in the facility, regardless of if they are considered security staff or non-security staff. Non-security staff understood their responsibilities to immediately notify someone from security.

	Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.
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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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. WCJ PREA Coordinated Response Plan 2. Interviews <ol style="list-style-type: none"> a. Jail Administrator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings 115.65(a): The Facility indicated compliance with this provision and provided the WCJ PREA Coordinated Response Plan. During the on-site audit, the Jail Administrator was interviewed. She confirmed that a coordinated plan had been developed and gave examples of actions that would be taken in response to an incident of sexual abuse.</p> <p>This auditor reviewed the coordinated plan and found it directs staff regarding actions to be taken in response to an incident of sexual abuse, including all elements required in this provision.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>

115.66	Preservation of ability to protect inmates from contact with 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: (Policies, directives, forms, files, records, etc.)

	<ul style="list-style-type: none"> a. WCJ PAQ <p>2. Interviews</p> <ul style="list-style-type: none"> a. Agency Head b. Jail Administrator <p>3. Site Review Observations:</p> <ul style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings</p> <p>115.66(a):</p> <p>The Facility indicated compliance with this provision and indicated the Agency has not entered into or renewed any collective bargaining agreement or other agreement since the last PREA audit.</p> <p>The responses provided on the Facility PAQ indicated:</p> <p>1. The agency, facility, or any other governmental entity responsible for collective bargaining on the agency’s behalf has not entered into or renewed any collective bargaining agreement or other agreement since the last PREA audit.</p> <p>During the on-site audit, the Agency Head and Jail Administrator were interviewed. The Agency Head reported that there are no collective bargaining agreements that prohibit WCJ from removing staff from contact with inmates pending the outcome of an investigation for alleged sexual abuse or harassment. The Jail Administrator reported the abuser can be reassigned to an area where there would be no contact with the victim.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.67	Agency protection against retaliation
	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: (Policies, directives, forms, files, records, etc.) <ul style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Monitoring documentation d. Investigative files 2. Interviews <ul style="list-style-type: none"> a. Agency Head b. Jail Administrator c. PREA Coordinator (Monitors retaliation) 3. Site Review Observations: <ul style="list-style-type: none"> a. Observations during on-site review of physical plant

Findings

115.67(a):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 8) establishes:

Staff and inmates have a right to be free from retaliation for reporting sexual harassment or abuse. All staff will immediately report any knowledge, suspicion or information regarding retaliation against staff or inmates who reported an incident, and will immediately report any staff neglect or violation of responsibilities that may have contributed to an incident of retaliation by another. Inmates and staff who report sexual harassment or abuse will be protected from retaliation by protective measures.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy to protect all confined person and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other confined persons or staff.
2. The agency designates staff members with monitoring for possible retaliation.
3. The PREA Coordinator is responsible for retaliation monitoring.

115.67(b-e):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 8) establishes:

Inmates and staff who report sexual harassment or abuse will be protected from retaliation by protective measures to include:

- a) Housing changes or transfers for inmate victims and/or abusers.
- b) Removal of alleged staff or inmate abusers from contact with victims.
- c) Emotional support services for inmate or staff who fear retaliations for reporting sexual harassment or abuse, or for cooperating with investigators.

For at least 90 days following a report of sexual harassment or abuse, the jail administration (staff) and classification unit (inmates) will monitor the conduct and treatment of staff or inmates who reported the incident, and of inmates who were reported to have suffered sexual harassment or abuse, to see if there are changes that may suggest possible retaliation by inmates or staff, and will report and act promptly to remedy any such retaliation. Monitoring will include periodic status checks. The applicable form will be completed documenting the periodic status checks. Other items monitored will include:

- a) Inmate disciplinary reports.
- b) Inmate housing changes.
- c) Inmate program changes.
- d) Inmate event logs.
- e) Staff performance.

If any other individual who cooperates with the investigation expresses a fear of retaliation, the jail administration will take appropriate measures to protect that individual against retaliation.

The responses provided on the Facility PAQ indicated:

	<ol style="list-style-type: none"> 1. The agency monitors the conduct or treatment of confined person or staff who reported sexual abuse and of confined persons who reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by confined persons or staff. 2. Reported that the agency monitors the conduct or treatment for a period of 90 days. 3. The agency acts promptly to remedy any such retaliation. 4. The agency continues such monitoring beyond the 90 days if the initial monitoring indicates a continuing need. 5. That there have been zero incidents of retaliation in the past 12 months. <p>A review of random facility retaliation logs confirmed that retaliation monitoring occurred on a consistent basis and monitored housing, discipline and work/program changes as well as other concerns. During the past 12 months there was one unsubstantiated sexual abuse allegation. The facility also monitors substantiated and unsubstantiated sexual harassment allegations.</p> <p>During the on-site audit, The Agency Head, Jail Administrator and PREA Coordinator were interviewed. The Agency Head reported that when a PREA incident is reported, management staff consider the best options for the victim. Things like housing changes or transfers from the facility, removal of alleged abusers (staff or inmate) and emotional support services are considered on a case-by-case basis. He also reported that designated staff are assigned to monitor confined persons and staff who reported the allegation for possible retaliation.</p> <p>The Jail Administrator reported that multiple protection measures were taken when individuals are monitored for possible retaliation. She reported protective measures may include housing changes</p> <p>The PREA Coordinator reported he meets with individuals being monitored for retaliation. Looks for changes in behavior that may suggest that retaliation may be occurring. Looks at things like discipline, programming or housing changes. Reported that monitoring will continue for 90 days or longer if needed. Reported that monitoring is documented on a standardized form.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this 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: (Policies, directives, forms, files, records, etc.)

- a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Monitoring documentation
 - d. Investigative files
2. Interviews
- a. Jail Administrator
 - b. Staff who supervise inmates housed in segregated housing
3. Site Review Observations:
- a. Observations during on-site review of physical plant

Findings

115.68(a):

The Facility indicated compliance with this provision and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 addresses the requirement of this standard.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse 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.
2. The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero.
3. The number of inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement was zero.
4. If an involuntary segregated housing assignment is made; the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.

During the on-site audit, the Jail Administrator and staff who supervise inmates housed in segregated housing were interviewed. The Jail Administrator reported that confined persons would not be placed in involuntary segregation unless no other options were available. She also reported that there are weekly meeting by classification staff regarding the status of all inmates housed in segregation. The staff who supervise inmates housed in segregated housing reported he did not recall that a confined persons was placed in this pod involuntarily for risk of being sexually abused.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Investigative files
2. Interviews
 - a. Investigator
 - b. PREA Coordinator
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.71(a-b):

The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 7) establishes;

An administrative or criminal investigation will be completed for all allegations of sexual harassment or abuse. The sexual abuse incident will be turned over to the Waukesha County Sheriff's Department and investigated by personnel who are trained in sexual abuse investigations in a correctional setting. Prosecution of offenders will be vigorously pursued by the Department as well as internal disciplinary action against the offender

The responses provided on the Facility PAQ indicated:

1. The agency has a policy related to criminal and administrative agency investigations.

During the on-site audit, Investigator was interviewed. He reported an administrative or criminal investigation will be completed for all allegations of sexual harassment or abuse. The sexual abuse incidents are turned over to the Waukesha County Sheriff's Department and investigated by detectives who are trained in sexual abuse investigations in a correctional setting. He further stated he received the required specialized training.

During the site review, the auditor reviewed random investigative files which reflected investigations were conducted promptly, thoroughly and objectively. A review of the investigative staff training documents indicated all investigative staff are trained in the required specialized investigative training.

115.71(c-g):

During interview with the Investigator, he detailed the investigative process to the auditor. The typical case involves gathering and preserving direct and circumstantial evidence, including available physical and DNA evidence, available electronic monitoring data, conducting interviews with alleged victims, suspected perpetrators, and witnesses, and also includes reviewing any prior complaints and reports of sexual abuse involving the suspected perpetrator. There were no investigations in the past

12 months that required compelled interviews. The Investigator indicated that the credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not determined by the person's status as an inmate or staff member. He also indicated that polygraph examination or other truth telling devices of the inmate who alleges sexual abuse is not allowed. All criminal reports are written.

The auditor reviewed random criminal investigations documentation and written reports which contained a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence.

115.71(h):

The responses provided on the Facility PAQ indicated:

1. Substantiated allegations of conduct that appear to be criminal are referred for prosecution.
2. 16 substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last PREA audit.

The investigator confirmed that substantiated allegations of conduct that appear to be criminal are referred for prosecution.

115.71(i):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 7) establishes;

All reports of sexual abuse within the institution will be kept in the Critical Incident file for data collection and reporting purposes, and will be retained as outlined in the Waukesha County Records Retention Schedule.

The responses provided on the Facility PAQ indicated:

The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

115.71(j):

The investigator reported that the departure of the alleged abuser or victim from the employment or control of The Waukesha County Jail does not provide a basis for terminating any investigation.

115.71(k):

The auditor is not required to audit this provision.

115.71(l)

All investigations are completed internally; therefore, this provision is not applicable.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

	<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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. Investigative files 2. Interviews <ol style="list-style-type: none"> a. Investigator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.72(a):</p> <p>The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12(p. 4) establishes facilities shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or harassment are substantiated.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. The agency imposes a standard of preponderance of evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment can be substantiated. <p>During the on-site audit, the Investigator was interviewed. He confirmed that a preponderance of the evidence is used in determining whether allegations of sexual abuse or harassment are substantiated.</p> <p>During the on-site audit, two investigative files were reviewed. The review indicated outcomes are based on a preponderance of evidence</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.73	Reporting to inmates
	<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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ

- b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
- c. Confined persons notification letters

2. Interviews

- a. PREA Coordinator

3. Site Review Observations:

- a. Observations during on-site review of physical plant

Findings:

115.73(a-e):

The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(pp. 7-8) establishes:

Following an investigation into an inmate's allegation that he or she suffered sexual abuse, the inmate will be informed whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. If the Waukesha County Sheriff's Department did not conduct the investigation, the jail administrator or designee will request the relevant information from the investigating agency in order to inform the inmate. The applicable form will also be completed documenting the notification. All reports of sexual abuse within the institution will be kept in the Critical Incident file for data collection and reporting purposes and will be retained as outlined in the Waukesha County Records Retention Schedule.

a) Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the inmate will be informed (unless the agency has determined that the allegation is unfounded) when:

1. The staff member is no longer posted within the inmate's housing pod.
2. The staff member is no longer employed by the Department.
3. The Department learns the staff member has been indicted on a charge related to sexual abuse within the facility.
4. The Department learns the staff member has been convicted on a charge related to sexual abuse within the facility.

b) Following an inmate's allegation that he or she has been sexually abused by another inmate, the victim inmate will be informed when:

1. The Department learns the alleged abuser has been indicted on a charge related to sexual abuse within the facility.
2. The Department learns the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

c) All notifications or attempted notifications will be documented.

d) The Department's obligation to report to the inmate will terminate if the inmate is released from custody or transferred from the Waukesha County Jail.

The responses provided on the Facility PAQ indicated:

1. The agency has a policy requiring that any confined person who makes an allegation that he or she suffered sexual abuse in an agency is informed, verbally or in writing as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency.
2. There were five criminal and/or administrative investigations of alleged confined person sexual abuse that were completed in the past 12 months.

	<p>3. Of the alleged sexual abuse investigations that were completed in the past 12 months, all inmates were notified, verbally or in writing, of the results of the investigation:</p> <p>4. The agency/facility is responsible for conducting administrative and criminal investigations.</p> <p>5. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently informs the inmate (unless the agency has determined that the allegation is unfounded) whenever:</p> <ul style="list-style-type: none"> • The staff member is no longer posted within the inmate's unit; • The staff member is no longer employed at the facility; • The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or • The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. <p>6. There were zero substantiated or unsubstantiated complaint of sexual abuse committed by a staff member against an inmate in an agency facility in the past 12 months</p> <p>7. Following an inmate's allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever:</p> <p>The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or</p> <p>The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p> <p>8. The agency has a policy that all notifications to inmates described under this standard are documented.</p> <p>9. In the past 12 months, seven notifications to inmates that were provided pursuant to this standard.</p> <p>10. Of those notifications made in the past 12 months, seven were documented.</p> <p>During the on-site audit, the PREA Coordinator was interviewed. He confirmed that confined persons are notified of the outcome of all allegations of sexual abuse and whether they were unfounded, unsubstantiated or substantiated.</p> <p>During the site review, the auditor examined examples of notification forms used for incidents and found them to be in compliance with all provisions of this standard.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.76	Disciplinary sanctions for staff
	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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. PREA Allegation log
2. Interviews
 - a. PREA Coordinator
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.76(a-d):

The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(pp. 8-92) establishes:

- a) Staff is subject to disciplinary sanctions up to and including termination for violating sexual harassment or abuse policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse.
- b) Disciplinary sanctions for violations of policies relating to sexual harassment or abuse will 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.
- c) All terminations for violations of sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies upon request and when the Department is in receipt of a properly executed Release of Information.
- d) The seriousness of the conduct will be taken into account when determining the appropriate commensurate response by the Department. Serious misconduct along these lines, even if committed once, will still be addressed by the Department.

The responses provided on the Facility PAQ indicated:

1. That staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
2. In the past 12 months the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies is zero.
2. In the past 12 months, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies is zero.
3. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment are commensurate with the nature and circumstances of the acts committed, the staff members' disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.
4. In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies is zero.

	<p>5. All terminations for violations of agency sexual a use or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies and to any relevant licensing bodies.</p> <p>6. In the past 12 months the number of staff from the facility that have. Been reported to law enforcement or licensing boards following their termination for violating agency sexual abuse or sexual harassment policies is zero.</p> <p>Review of the PREA allegations log revealed there were no substantiated staff allegations of sexual abuse or harassment. Interview with the PREA Coordinator confirmed there were no allegations that staff violated the agency sexual abuse or sexual harassment policies. As there were no staff that violated the agency sexual abuse or sexual harassment policies, there were no disciplinary records to review.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. PREA Allegation log 2. Interviews <ol style="list-style-type: none"> a. Jail Administrator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.77(a-b):</p> <p>The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12(p. 9) establishes:</p> <ol style="list-style-type: none"> a) Any contractor or volunteer who engages in sexual abuse will be reported to law enforcement agencies and to relevant licensing bodies, upon request and when the Department is in receipt of a properly executed Release of Information. b) The contractor or volunteer will be denied any further access to the institution and to the inmates. <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. Agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law

	<p>enforcement agencies and to relevant licensing bodies.</p> <p>2. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with confined persons.</p> <p>3. In the past 12 months zero contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of confined persons.</p> <p>4. The facility takes appropriate remedial measures and considers whether to prohibit further contact with confined persons in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Review of the PREA allegations log revealed there were no substantiated contractor or volunteer allegations of sexual abuse or harassment. Interview with the Jail Administrator reported that if any allegations of sexual abuse or sexual harassment were to be made toward a volunteer or contractor, they would immediately be placed on admin leave and an investigation would be started. She confirmed there were no allegations that any contractor or volunteer staff violated the agency sexual abuse or sexual harassment policies. As there were no contractor or volunteer that violated the agency sexual abuse or sexual harassment policies, there were no disciplinary records to review.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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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> <ol style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 2. Interviews <ol style="list-style-type: none"> a. Jail Administrator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings: 115.78(a-d): The Facility indicated compliance with these provisions and provided the Agency PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 9) establishes: a) Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-</p>

inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

b) Sanctions will 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 (reference jail policy 360.3)

c) The disciplinary process will 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.

d) Inmates will be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to the contact.

e) For the purpose of disciplinary action, a report of sexual abuse based on reasonable belief in the alleged conduct will not be considered falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

f) All sexual activity between inmates in the Waukesha County Jail is prohibited and inmates will be disciplined for such activity. WSD will not, however, deem such activity to constitute sexual abuse if it is determined the activity is not coerced.

The responses provided on the Facility PAQ indicated:

1. Confined persons are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that a confined person engaged in confined person-on-confined person sexual abuse.
2. Confined persons are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for confined person-on-confined person sexual abuse.
3. In the past 12 months zero administrative findings of confined person-on-confined person sexual abuse have occurred at the facility.
4. In the past 12 months, zero criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility.
5. The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse.
6. the facility does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

During the on-site audit, the Jail Administrator was interviewed. She confirmed various levels and types of discipline that may be used with confined persons. In all cases, any disability that the confined person may have will be taken into consideration. She confirmed that the Facility had no incidents relating sexual abuse incidents that resulted in a confined person disciplinary action.

115.78(e):

The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 9) establishes;

d) Inmates will be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to the contact.

The responses provided on the Facility PAQ indicated:

	<p>1. That the agency disciplines confined persons for sexual conduct with staff only upon finding that the staff member did not consent to such contact.</p> <p>The Jail Administrator confirmed there were no incidents of sexual contact between a staff and confined person. Therefore, there were no investigative files or disciplinary reports to review.</p> <p>112.78(f): The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 9) establishes; e) For the purpose of disciplinary action, a report of sexual abuse based on reasonable belief in the alleged conduct will not be considered falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>The responses provided on the Facility PAQ indicated: 1. The agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegations.</p> <p>112.78(g): The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 9) establishes; f) All sexual activity between inmates in the Waukesha County Jail is prohibited and inmates will be disciplined for such activity. WSD will not, however, deem such activity to constitute sexual abuse if it is determined the activity is not coerced.</p> <p>The responses provided on the Facility PAQ indicated: 1. The agency prohibits all sexual activity between confined persons. 2. Sexual activity between confined persons is deemed to constitute sexual abuse only if it determines that the activity is coerced.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Waukesha County Sheriff's Department Policy and Procedure 351.1

d. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06

e. Medical/mental health secondary materials

2. Interviews:

a. Medical and Mental Health staff

b. Staff Responsible for Risk Screening

c. Confined persons who Disclose Sexual Victimization

3. Site Review Observations:

a. Observations during on-site review of physical plant

Findings:

115.81 (a- b):

These provisions are not applicable as WCJ is not a prison.

115.81(c):

The Facility indicated compliance with this provision and provided the Agency Policies in its PAQ. The Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (p.4) establishes;

6.8.1. Patients identified as being at-risk for sexual victimization or abusiveness and for whom custody staff believe there is a need for immediate medical and/or mental health assessment shall be referred for immediate medical and/or mental health assessment at the time of the intake screening.

6.8.2. Patients identified as being at-risk for sexual victimization or abusiveness with no identified, immediate medical and/or mental health needs will be referred for medical/mental health screening within 14 days of intake.

The responses provided on the Facility PAQ indicated:

1. All inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner.

2. The follow-up meeting was offered within 14 days of the intake screening.

3. All inmates who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner:

4. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.

Interview with staff responsible for risk screening reported that confined persons who experienced prior sexual victimization are offered follow-up services, within 14 days of intake.

Interviews with inmates who disclosed prior victimization reported they were offered follow-up services.

A review of risk screening records revealed that inmates who had experienced prior sexual victimization or perpetrated sexual abuse were offered follow up services.

Secondary medical and mental health records were randomly reviewed by the auditor to determine compliance with this provision.

.115.81(d):

The Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (p.4) establishes;

	<p>6.5. All information related to sexual victimization or abusiveness that occurred in the institutional setting will be strictly limited to health care staff and other staff to inform treatment plans and security/management decisions, as required by federal, state, and local law.</p> <p>The responses provided on the Facility PAQ indicated:</p> <p>1. the information shared with other staff is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.</p> <p>115.81(e):</p> <p>The Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (p.5) establishes;</p> <p>6.6. Consent of the patient, 18 years of age or older, is required before reporting an incident of sexual abuse that occurred prior to incarceration, except when the incident occurred in another correctional institution or in the event that the patient is under 18 years of age, as permitted by law.</p> <p>The responses provided on the Facility PAQ indicated:</p> <p>1. Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.</p> <p>Interviews with medical and mental health staff reported that they must obtain consent at the start of each session.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12 c. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 2. Interviews <ol style="list-style-type: none"> a. Medical and Mental health staff b. Random staff 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant

	<p>Findings:</p> <p>115.82(a-d):</p> <p>The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (pp. 1 & 6) establishes:</p> <p>Treatment services are provided free of charge to every victim of sexual abuse, regardless of whether the victim discloses the name of the abuser or fails to cooperate with any investigation arising out of the incident.</p> <p>Prompt and appropriate health intervention will take place in the event of a sexual abuse in an effort to minimize medical and psychological trauma.</p> <p>6.11.1. QHP will complete a baseline history and assessment to determine time and date of incident and current presenting physical and mental status, and QHP will stabilize the patient for transport to the designated SART hospital.</p> <p>The responses provided on the Facility PAQ indicated:</p> <ol style="list-style-type: none"> 1. Confined person victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. 2. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgement. 3. Medical and mental staff maintain secondary materials documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services 4. Confined person victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. 5. Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. <p>During the on-site audit, Random staff were interviewed. Staff interviews indicated that staff understood their responsibilities protect the victim when responding to an incident and that access to medical treatment would be provided. Interviews with medical and mental health staff reported victims of sexual abuse have access to emergency medical treatment and crisis intervention services immediately and the need for these services are determined by medical staff.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
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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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-
2. Interviews
 - a. Medical and Mental health staff
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.83(a-f):

The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 7) establishes:

13) Post Event Activities.

- a) Mental Health Staff. Any inmate involved in an alleged or actual sexual abuse or misconduct incident will be referred to the mental health staff for assessment and follow up. Housing will be determined to ensure the inmate's safety as well as address any resulting mental health concerns. Concerns may include feelings of self-loathing, anger, rage, humiliation, nightmares, isolation and depression. Community professional agencies may be utilized as necessary.
- b) Medical Staff. The jail medical staff will follow up with any required medical care and/or treatment following the incident. Additional physical symptoms following a traumatic event may include headaches, stomach aches, sleep disturbances and loss of appetite. Any concerns are to be reported to the medical staff.
- c) Jail Chaplain. As deemed appropriate by the mental health staff or classification unit, or as requested by the inmate, the jail chaplain or other religious agency will be contacted and utilized as necessary.

Wellpath Waukesha County Jail Policies & Procedures HCD-100_F-06 (p 1& 8) establishes:

Treatment services are provided free of charge to every victim of sexual abuse, regardless of whether the victim discloses the name of the abuser or fails to cooperate with any investigation arising out of the incident.

6.19.1. Continued evaluation and treatment of medical and mental health needs related to sexual abuse will be provided in accordance with the patient's desire for treatment and the community standard of care. Services may be provided through sick call, chronic care clinics, and regular annual health examinations.

6.19.2. After any emergency treatment is provided, health care staff will notify mental health staff of the event. An immediate telephone referral, including after hours, is the preferred referral format in case of an abuse.

If after-hours mental health issues are handled by health care staff at the facility, the

evaluating health care staff member will assess need for immediate crisis-based interventions. The on-call psychiatrist may be contacted for consultation if such is deemed necessary.

6.19.3. If needed, a treatment plan will be developed regarding any additional medical follow-up required.

6.19.4. Mental health staff will assess need for crisis intervention, and provide those services as necessary.

Mental health staff will offer ongoing follow-up services. If the patient refuses such services, the patient will be informed that a mental health staff member will follow up in 14 days to determine if the patient is functioning adequately and offer any follow-up services. All encounters will be documented in the patient's health record, including any refusals of follow-up services.

6.19.5. When necessary and appropriate, post-release information and instructions will be provided for continuity of care. All discharge planning actions/instructions will be documented. One copy will be given to the patient and the other copy will be filed in the patient's health record.

The responses provided on the Facility PAQ indicated:

1. The facility offers medical and mental health evaluation and, as appropriate, treatment to all confined persons who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.
2. Female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests.
3. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services.
4. Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.
5. Victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate

There were no confined persons currently at the facility that reported sexual abuse. During the on-site audit, medical and Mental health staff were interviewed. They confirmed that continued evaluation and treatment of medical and mental health needs related to sexual abuse will be provided.

115.83(h):
The Facility indicated not applicable as WCJ is not a prison.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard

Auditor Discussion

- 1. Documents: (Policies, directives, forms, files, records, etc.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. NMRA Local Policy 2024-6
 - d. PREA Incident Review Reports
- 2. Interviews
 - a. PREA Coordinator
- 3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.86(a-e):

The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 10) establishes:

- a) At the direction of the jail administrator, a sexual abuse incident review will be conducted by a review team at the conclusion of every sexual abuse investigation, including when the allegation has not been substantiated, unless the allegation has been determined to be unfounded.
- b) The review will occur within 30 days of the conclusion of the investigation unless exigent circumstances exist.
- c) The review team will include the jail administrator or designee, the PREA coordinator, with input from captains, lieutenants, investigators and medical or mental health staff.
- d) The review team will:
 - 1. Consider whether the allegation or investigation indicated a need to change policy and procedure to better prevent, detect, or respond to sexual abuse.
 - 2. 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 was motivated or otherwise caused by other group dynamics at the facility.
 - 3. Examine the area in a facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
 - 4. Assess the adequacy of staffing levels in that area during different shifts.
 - 5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
 - 6. Prepare a report of findings using the applicable form and any recommendations for improvement, and submit the report to the jail administrator and Department PREA coordinator.
 - 7. Recommendations for improvement will be implemented, or reasons for not doing so will be documented.

The responses provided on the Facility PAQ indicated:

- 1. The facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be

- unfounded.
2. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility was one.
 3. The facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.
 4. In the past 12 months there was one criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days.
 5. The sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.
 6. The facility prepares a report of its findings from sexual abuse incident review, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section and any recommendations for improvement, and submits such report to the facility head and PREA Coordinator.
 7. The facility implements the recommendations for improvement or documents ins reasons for not doing so.

During The on-site audit, The PREA Coordinator was interviewed. The PREA Coordinator reported that the facility has an incident review team that includes himself, the Jail Administrator, Assistant Jail Administrator and input from Captain, Lieutenant, Investigator, and Medical, or Mental Health staff. He reported that the review includes things like camera placement within the facility, what might have contributed to the incident such as gang affiliations, race, gender, and how the individuals may identify. If review report necessitates corrective action, he works with the applicable department heads to implement appropriate measures. To date, no systemic trends have been identified. He reported that there have been one unsubstantiated allegations of sexual abuse at the WCJ in the past 12 months and a sexual abuse incident review was conducted. He also indicated incident reviews are also completed for sexual harassment allegations.

During the on-site audit, PREA Incident Review Reports were reviewed. They were completed within 30 days of the conclusion of the investigation and the review team included upper management staff. The review was completed on a standardized form and determinations are made pursuant to paragraphs (d)(1) -(d)(5) of this standard and any recommendations for improvement.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. WCJ PREA Annual Report
 - d. WCJ website
 - e. PREA Incident Review form
2. Interviews
 - a. Agency Head
 - b. PREA Coordinator
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.288(a-f):

The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 10) establishes:

The jail administrator or designee will review the data collected and aggregated in order to assess and improve the effectiveness of the jail sexual abuse prevention, detection and response policies, practices, and training, by:

- a) Identifying problems areas.
- b) Taking corrective action on an ongoing basis.
- c) Preparing an annual report of its findings and corrective action. The report will include a comparison of the current year's data and corrective action with those from prior years and will provide an assessment of the agency's progress in addressing sexual abuse.

The responses provided on the Facility PAQ indicated:

1. The agency reviews data collected and aggregated pursuant to 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:
 - (a) identifying problem areas;
 - (b) taking corrective action on an ongoing basis; and
 - (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.
2. The annual report includes a comparison of the current year's data and corrective actions with those from prior years.
3. The report provides an assessment of the agency's progress in addressing sexual abuse.
4. The agency makes its annual report readily available to the public at least annually through its website.
5. When the agency redacts material from an annual report for publication the redactions are limited to specific materials where publication would represent a clear and specific threat to the safety and security of the facility.
6. The agency indicates the nature of material redacted.

During the on-site audit, the Agency Head and PREA Coordinator were interviewed.

	<p>The Agency Head reported that WCJ conducts sexual abuse incident reviews after each substantiated or unsubstantiated case. Any recommendations for improvement, problem areas identified, or corrective actions needed are documented. These recommended improvements are submitted to the appropriate authority annually for review and approval.</p> <p>The PREA Coordinator reported that he is required to complete the “PREA Incident Review,” after each substantiated or unsubstantiated case. Any recommendations for improvement, problem areas identified, or corrective actions needed are documented. Personally identifiable information is excluded for confidentiality purposes. He indicated WCJ publishes a PREA report annually. Currently, the 2023 annual PREA data report is available on WCJ’s website.</p> <p>During the audit review, the WCJ PREA Annual Report was examined and found to comply with all aspects of the standards.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>
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115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> 1. Documents: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. WCJ PAQ b. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 c. WCJ PREA Annual Report d. WCJ website e. PREA Incident Review form 2. Interviews <ol style="list-style-type: none"> a. Agency Head b. PREA Coordinator 3. Site Review Observations: <ol style="list-style-type: none"> a. Observations during on-site review of physical plant <p>Findings:</p> <p>115.88(a-f):</p> <p>The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12(p. 10) establishes:</p> <p>The jail administrator or designee will review the data collected and aggregated in order to assess and improve the effectiveness of the jail sexual abuse prevention, detection and response policies, practices, and training, by:</p>

- a) Identifying problems areas.
- b) Taking corrective action on an ongoing basis.
- c) Preparing an annual report of its findings and corrective action. The report will include a comparison of the current year’s data and corrective action with those from prior years and will provide an assessment of the agency’s progress in addressing sexual abuse.

The responses provided on the Facility PAQ indicated:

1. The agency reviews data collected and aggregated pursuant to 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:
 - (a) identifying problem areas;
 - (b) taking corrective action on an ongoing basis; and
 - (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.
2. The annual report includes a comparison of the current year’s data and corrective actions with those from prior years.
3. The report provides an assessment of the agency’s progress in addressing sexual abuse.
4. The agency makes its annual report readily available to the public at least annually through its website.
5. When the agency redacts material from an annual report for publication the redactions are limited to specific materials where publication would represent a clear and specific threat to the safety and security of the facility.
6. The agency indicates the nature of material redacted.

During the on-site audit, the Agency Head and PREA Coordinator were interviewed. The Agency Head reported that WCJ conducts sexual abuse incident reviews after each substantiated or unsubstantiated case. Any recommendations for improvement, problem areas identified, or corrective actions needed are documented. These recommended improvements are submitted to the appropriate authority annually for review and approval.

The PREA Coordinator reported that he is required to complete the “PREA Incident Review,” after each substantiated or unsubstantiated case. Any recommendations for improvement, problem areas identified, or corrective actions needed are documented. Personally identifiable information is excluded for confidentiality purposes. He indicated WCJ publishes a PREA report annually. Currently, the 2023 annual PREA data report is available on WCJ’s website.

During the audit review, the WCJ PREA Annual Report was examined and found to comply with all aspects of the standards.

Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.

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.)
 - a. WCJ PAQ
 - b. Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12
 - c. WCJ PREA Annual Report
 - e. WCJ website
2. Interviews
 - a. PREA Coordinator
3. Site Review Observations:
 - a. Observations during on-site review of physical plant

Findings:

115.89(a-d):

The Facility indicated compliance with these provisions and provided the Agency and Facility PREA Policy in its PAQ. The Waukesha County Sheriff's Department/Jail Policy and Procedure 361.12(p. 10) establishes:

- a) Data collected (reference section 20 above) will be securely retained.
- b) Aggregated sexual abuse data will be readily available to the public at least annually through its website.
- c) Before making aggregated sexual abuse data publicly available, all personal identifiers will be removed.
- d) Other specific material may be redacted from the report when publication would present a clear and specific threat to the safety and security of a facility, but the report must indicate the nature of the material redacted.
- e) Sexual abuse data collected will be maintained for at least ten (10) years after the date of the initial collection unless Federal, State, or local law requires otherwise.

The responses provided on the Facility PAQ indicated:

1. The agency ensures that incident-based and aggregate are securely retained.
2. Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.
3. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.
4. The agency maintains sexual abuse data collected pursuant to 115.287 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.

During the on-site audit the PREA Coordinator was interviewed. The PREA Coordinator reported that WCJ maintains a secure PREA electronic site with restricted access to retain all PREA related data. He stated he enters every sexual abuse incident and documentation pertaining to said incident. Review of WCJ PREA Annual Report revealed that data is collected, reviewed and published annually. The WCJ website was reviewed and confirms the WCJ PREA Annual Reports are published annually.

	Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.
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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: (Policies, directives, forms, files, records, etc.) <ol style="list-style-type: none"> a. Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12 b. WCJ PREA Audit Report d. WCJ website <p>Findings:</p> <p>115.401(a-b): The Waukesha County Sheriff’s Department/Jail Policy and Procedure 361.12(p. 11) establishes: A review of the Jail Division’s operations and policies in relation to compliance of PREA standards is subject to an audit by a Department of Justice PREA-certified independent auditor.</p> <p>WCJ Only has one facility. WCJ website review shows that the agency has met the obligation the facility audited every three years. The prior WCJ PREA Audit was completed in 2021.</p> <p>115.401 (h-l, m-n)</p> <p>The auditor had access to and observed all areas of the WCJ. The auditor was permitted to request and was provided with copies of all relevant documents. The auditor was given a private room to conduct interviews with both confined persons and staff. Audit notices were posted in English and Spanish six weeks prior to the onsite and confined persons were permitted to send confidential information or correspondence to the auditor in the same manner as with legal counsel. The auditor did not receive any correspondence prior to the onsite audit.</p> <p>Based upon the systematic review and analysis of all the available evidence, the auditor has determined that the facility is substantially compliant with all provisions of this standard.</p>

115.403	Audit contents and findings
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Auditor Overall Determination: Meets Standard

Auditor Discussion

115.403

The following evidence was analyzed in making the compliance determination:

1. Documents: (Policies, directives, forms, files, records, etc.)
 - a. WCJ PREA Audit Report 2021
 - b. WCJ website

Findings:

115.403(f)

A review of the WCJ website demonstrates compliance with the posting of previous final PREA Audit report.

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	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.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	Policies to ensure referrals of allegations for investigations	

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	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?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has 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.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

(f)		
	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