

# PREA Facility Audit Report: Final

**Name of Facility:** Charlotte County Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 11/06/2020

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" 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 checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Lynni OHaver	<b>Date of Signature:</b> 11/06/2020

AUDITOR INFORMATION	
<b>Auditor name:</b>	O'Haver, Lynni
<b>Email:</b>	scarlettohara1@mac.com
<b>Start Date of On-Site Audit:</b>	09/16/2020
<b>End Date of On-Site Audit:</b>	09/18/2020

FACILITY INFORMATION	
<b>Facility name:</b>	Charlotte County Jail
<b>Facility physical address:</b>	26601 Airport Road, Punta Gorda,, Florida - 33982
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Tabbatha Carter
<b>Email Address:</b>	tcarter@ccsofl.net
<b>Telephone Number:</b>	2398784114

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Michael Anderson
<b>Email Address:</b>	manderson@ccsofl.net
<b>Telephone Number:</b>	941-833-6324

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Ryan Barber
<b>Email Address:</b>	rbarber@ccsofl.net
<b>Telephone Number:</b>	
<b>Name:</b>	Deborah Maikowski
<b>Email Address:</b>	deborah.maikowski@ccso.org
<b>Telephone Number:</b>	O: (941) 575-5243

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Bonnie Gould-Hanlon
<b>Email Address:</b>	bgould-hanlon@ccsofl.net
<b>Telephone Number:</b>	941-833-6340

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	1074
<b>Current population of facility:</b>	573
<b>Average daily population for the past 12 months:</b>	616
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	19-72
<b>Facility security levels/inmate custody levels:</b>	Minimum to Max Seg
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	227
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	137
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	146

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Charlotte County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	7474 Utilities Road, Punta Gorda, Florida - 33982
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

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

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Tabatha Carter	<b>Email Address:</b>	tcarter@ccsofl.net

## AUDIT FINDINGS

### **Narrative:**

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

### **Audit Narrative**

The Charlotte County Sheriff's Office Detention Center is located at 26601 Airport Road, in Punta Gorda Florida. Punta Gorda Florida is located along the Gasparilla Sound - Charlotte Harbor, approximately 24 miles north of Fort Meyers Florida.

Charlotte County Sheriff's Office Detention Bureau is participating in the Prison Rape Elimination Act (PREA) audit. The on-site portion of the audit was conducted by a certified Department of Justice PREA Auditor, at the above address on September 16 - 18, 2020. The assigned PREA Auditor conducted this audit as a reciprocal audit with no conflict of interest. This is the second audit for Charlotte County Sheriff's Office; the first audit was completed on March 27 - 28, 2017.

### **Pre-Onsite Audit Phase**

On March 9, 2020, the Auditor sent an introduction email to the Charlotte County Sheriff's Office PREA Coordinator to discuss the facility's upcoming PREA audit and to request a conference call to discuss further specifics of the audit.

Along with a brief introduction, in the Auditor's email to the facility staff, the Auditor noted the facility had already submitted the PREA Audit Questionnaire (PAQ) in the PREA Online Audit System (OAS). The Auditor discussed the PAQ review process, audit logistics, audit schedule / timelines, goals, and expectations of the audit. The Auditor also included the PREA Audit Notifications (English/Spanish), which contained the mailing address (P.O. Box) for confidential correspondence from inmates or staff relating to PREA prior to, during, and after the PREA audit; the Auditor also requested the notifications be posted in accordance with the required standards.

Due to the current COVID 19 pandemic, the initial on-site audit dates of August 26 – 28, 2020 were rescheduled to September 16 -18, 2020. The Auditor emailed updated PREA Audit Notifications to the facility and requested the notifications be posted in accordance with the required standards.

The audit notifications contained the scheduled dates of the audit, the purpose of the audit, the Auditor's name and contact information, and a statement regarding the confidentiality of any communication between the Auditor and inmates who respond to the notice with the exception of mandatory reporting laws that may apply to the Auditor. The Post Office box acquired for the audit was used strictly for correspondence from inmates or staff for the purpose of the PREA Audit.

During the on-site tour of the facility, the Auditor observed the audit notifications posted throughout the facility. The audit notifications were posted in visible locations where inmate traffic is high. These locations included every housing dormitory, inmate common areas, hallways, medical areas, inmate program areas, intake and release, and in inmate work areas (laundry, food service, etc.).

On August 4, 2020, the Auditor began a systematic review process of the Pre-Audit Questionnaire responses to each standard and the supporting documentation, policies, and procedures. Supporting documentation included, but not limited to:

- Staff training records (certified, civilian, contractor, volunteer)
- Inmate intake screenings & assessments
- Inmate medical & mental health assessments
- Inmate PREA education (initial & comprehensive)
- All Sexual abuse & sexual harassment Administrative Investigations - August 2019 – August 2020
  - (Substantiated, unsubstantiated, inmate-on- inmate, staff-on-inmate)
- All Sexual abuse & sexual harassment Criminal Investigations - August 2019 – August 2020
  - (Substantiated, unsubstantiated, inmate-on-inmate, staff-on-inmate)

On August 6, 2020, the Auditor completed the systematic review of the PAQ and supporting documentation, the Auditor emailed Charlotte County Sheriff's Office Staff requesting clarification to a few standards or PAQ responses and along with a request for additional documentation. The Facility Staff Member uploaded the additional documentation into the OAS Supplemental file within days of the initial request. The documents uploaded to the OAS Supplemental file include:

- Inmate Rosters by Housing area
- List of LEP inmates
- List of Non-heterosexual inmates
- List of Transgender inmates
- List of Inmates who reported Sexual Abuse or Sexual Harassment during the 12 months prior to the audit
- All hotline calls made in the 12 months prior to the audit
- Grievances from the 12 months prior to the audit
- PREA Hotline Calls
- All incident reports from the 12 months preceding the audit
- Staff roster (certified & civilian staff, contract, & volunteer; requested by shift assignment/work hours)
- List of New Hires & Promotions from the last 12 months

- Facility Site Map
- Camera Totals (Inside & Out)

On August 6, 2020, the Auditor emailed the CSC and provided the staff interviews list and documents/files to be reviewed during the on-site visit:

- Agency Head or Designee
- Administrative (Human Resources) Staff
- Agency Contract Administrator
- Classification Staff
- Contractors & volunteers who have contact with inmates
- Designated Staff who monitor retaliation
- Education & Program Staff Who Work with Youthful Inmates
- Incident Review Team
- Intake Staff
- Intermediate or Higher-level Facility Staff
- Investigative Staff
- Line Staff Who Supervise Youthful Inmates
- Medical & Mental Health Staff
- PREA Compliance Manager
- PREA Coordinator
- SANE/SAFE Staff
- Security Staff – First Responders
- Staff who perform screening for risk of victimization
- File review – personnel, volunteer/contractor, inmate & Medical and Mental Health (victims of SA/SH)
- All Charlotte County Sheriff's Office PREA investigative case files

The total number of PREA hotline calls reported during the 12 months preceding the audit were zero. The number of sexual abuse and sexual harassment allegations in the 12 months prior to the audit (August 2019 – August 2020) was seven. The following charts provide a breakdown of the seven allegations:

Total Number of Allegations			
	Inmate-on-Inmate	Staff-on-Inmate	Total
Substantiated	0	0	0
Unsubstantiated	5	0	5
Unfounded	1	1	2
In progress	0	0	0
Total	6	1	7

Total Number of Sexual Abuse Allegations			
	Inmate-on-Inmate	Staff-on-Inmate	Total
Substantiated	0	0	0
Unsubstantiated	0	0	0
Unfounded	1	0	1
In progress	0	0	0
Total	1	0	1

Total Number of Sexual Harassment Allegations			
	Inmate-on-Inmate	Staff-on-Inmate	Total
Substantiated	0	0	0
Unsubstantiated	5	0	5
Unfounded	0	1	1
In progress	0	0	0
Total	5	1	6

Investigations			
	Inmate-on-Inmate	Staff-on-Inmate	Total
Administrative	5	1	6
Criminal	1	0	1
Total	6	1	7

Referred for Prosecution		
	Sexual Abuse	Sexual Harassment
Inmate-on-Inmate	0	0
Staff-on-Inmate	0	0

## Research

During the pre-on-site audit phase, the Auditor conducted an internet search on the facility to include reviewing the agency website. The agency website contained multiple links to previous annual reports and audits for Charlotte County Sheriff's Office. The Auditor reviewed the prior PREA Audit (March 2017) and the Annual Reports (§115.88). The Auditor also reviewed the mandatory reporting laws for the State of Florida.

The Auditor contacted Just Detention International, a health and human rights organization that seeks to end sexual abuse in all forms of confinement. The Auditor submitted an inquiry to determine if the agency had received any complaints from Charlotte County Sheriff's Office within the past 12 months; a representative from Just Detention International informed the Auditor that Just Detention International had not received any complaints regarding Charlotte County Sheriff's Office. The Auditor also conducted research, specific to Charlotte County Sheriff's Office, on the websites of the Department of Justice Civil Rights Division and the Southern Poverty Law Center with negative results from each.

During the pre-on-site phase of the audit, the Auditor reviewed provided documentation, which included the SANES/SAFEs evidence protocol for the State of Florida, Sexual Assault Kit Form for Healthcare Providers; contracts between CCSO and Prison Health Services, Inc. & Columbia Fawcett Memorial

Hospital; and the CCSO and the Center for Abuse & Rape Emergencies, Inc. The contracts use clear and concise language, provides the agency's responsibilities, the contractor's responsibilities, and the reporting and documentation requirements for each. Additionally, the two contracts describe in detail, the expectations, and responsibilities of each contractor including performance measures, contract terms, and financial consequences if the required service is not met.

The Columbia Fawcett Memorial Hospital is a 253-bed, full-service acute care hospital with a 24-hour emergency care center serving the Charlotte County and surrounding areas. During the on-site phase of the audit, the Auditor conducted an interview with the SAFE Nurse employed by the Columbia Fawcett Memorial Hospital.

The SANE Nurse explained to the Auditor the procedure of a forensic medical examination, to include following the use of the State of Florida, Sexual Assault Kit Form for Healthcare Providers that contains a twelve-page Sexual Assault Medical/Forensic Exam report that is completed for every forensic exam. The SAFE Nurse explained a sexual battery/assault victim (inmate) would be brought to the Columbia Fawcett Memorial Hospital where a forensic exam would be completed. The SANE Nurse confirmed that either she or other medical practitioners are available 24/7. The SAFE Nurse confirmed there were no forensic medical examinations completed for Charlotte County Sheriff's Office during the past 12 months.

The Center for Abuse & Rape Emergencies, Inc. is a non-profit behavioral health center that provides crisis intervention services, victim advocacy services for victims of sexual assault, and behavioral health services. The Center for Abuse & Rape Emergencies is the outside reporting entity for the inmates at Charlotte County Sheriff's Office to report sexual abuse and sexual harassment. Inmates may report to the Center for Abuse & Rape Emergencies by phone or in writing; the phone number and the mailing address is posted in every inmate dormitory next to the inmate phones and on every inmate smart tablet.

During the on-site phase of the audit, the Auditor conducted an interview with a certified rape crisis counselor and she confirmed the existing contract agreement with the facility. She provided a very detailed description of the advocacy services provided to the inmates at Charlotte County Sheriff's Office to include the staffing of the rape crisis hotline 24 hours a day, 7 days a week. During the on-site phase of the audit, the Auditor conducted a tour of the facility and tested at least one phone in every housing area to ensure availability and functionality; all phones tested were confirmed to be working properly.

The Auditor did not receive any correspondence from staff or inmates prior to, during, or after the PREA audit.

## **On-Site Audit Phase**

The Charlotte County Sheriff's Office Detention Center is located at 26601 Airport Road, in Punta Gorda Florida. Punta Gorda Florida is located along the Gasparilla Sound - Charlotte Harbor, approximately 24 miles north of Fort Meyers Florida.

The rated capacity of Charlotte County Sheriff's Office is 1074 with an average daily population (ADP) of 616 for the 12 months preceding the audit. The inmate population on the first day of the audit was 523.

The Charlotte County Sheriff's Office Detention facility is a direct supervision jail with sixteen housing areas to include open bay housing areas, multiple occupancy cell housing areas, work release unit, segregation housing area, medical infirmary, and a juvenile unit. A direct supervision jail requires an officer to be stationed inside the housing unit. This concept encourages direct interaction between staff and inmates to prevent negative behavior. The current layout of the facility groups inmates into living units that can house up to sixty-four inmates.

The building also has an Admission and Release area, Classification offices, designated courtroom, and Supervisory Staff Offices are located strategically throughout the facility. There is also a designated inmate laundry area, facility maintenance room, and the facility kitchen.

The multi-storied infirmary is designed to have separation between clinic areas, medical inmates, and psychological treatment inmates. The first floor of the infirmary provides medical care for all inmates. Medical treatment includes dental, x-ray, and external vendors for ultrasound and dialysis. The second floor is designed for medical treatment inmates. All the cells are negative pressure cells. The third floor houses inmates that are under the care and treatment of Mental Health Practitioners. All cells have cameras that are monitored continuously.

On Wednesday, September 23, the first day of the audit, an entrance meeting was held with the Facility Warden, PREA Compliance Manager, PREA Compliance Coordinator, and a multitude of Facility Supervisors. Following the entrance meeting, the Auditor toured the facility from 0930 hours to 1130 hours. The Auditor was escorted by the Captain, Watch Commander, PREA Compliance Manager, PREA Coordinator, and several facility Supervisors.

The Auditor used the National PREA Resource Center, PREA Compliance Instrument-Instructions for PREA Audit Tour when conducting the on-site review. The areas visited, for each facility, include housing areas, medical infirmary, admissions and release, security control rooms, inmate classification, food service, laundry, educational, vocational, and program areas.

During the tour, the Auditor observed opposite gender announcements, tested the inmate phone system,

viewed PREA Audit notifications posted throughout, and PREA educational material and contact information for rape crisis counseling and emotional support services. The Auditor observed the PREA information posted in inmate housing areas, inmate common areas, recreational and educational buildings, and in throughout the facility.

The Auditor also observed multiple security cameras including the camera angles, privacy, and line of sight for shower and toilets. The Auditor did not observe any issues with privacy or line of sight; announcements are made when opposite gender enters the housing areas. The shower and bathroom areas within each dorm contain concrete privacy walls, which are constructed in such a manner that provides privacy as well as allowing staff to have a partial view of the inmate (walls covers midsection of the body); this allow privacy as well as ensuring the safety and security of all inmates. The Auditor did not observe blind spots during the facility tour.

The Auditor observed supervision practices of unannounced rounds, supervision ratios and security staff ratios, and security staff posts throughout the facility tour.

Throughout the facility tour, the Auditor observed inmates participating in programs, various inmate movement throughout the facility, inmates participating in recreation, and inmates actively working in assigned jobs throughout the facility compound. The Auditor was able to observe the interaction between staff and inmates inside the housing units and throughout the facility and conduct informal interviews of certified staff, civilian staff, contract staff, and inmates in each dormitory and throughout the facility.

Charlotte County Sheriff's Office reported 266 cameras installed and operational. Of the total 266 cameras, 236 are located in the interior and 30 cameras are strategically placed on the exterior of the building. The interior cameras are located in the facility lobby, throughout the facility hallways, multiple cameras in housing areas, program and educational areas, and intake and transfer. Exterior cameras are installed in all the exterior walkways and entrances and along the outside perimeter.

## **Staff Interviews**

The PREA Auditor handbook requires Auditors to interview a representative sample of staff, supervisors, and administrators in the audited facility. Auditors must conduct interviews with a random sample of staff selected from varying shifts and work assignments, as well as targeted interviews with staff, which have specialized roles and responsibilities within the facility.

The Auditor conducted twenty random sampling of staff interviews. This random sampling of staff included at least one member from each shift, staff from diverse work assignments, supervisors and line

staff, males and females, and staff of various diversities. There are two security staff shifts. Dayshift hours are 0600 – 1800 hours and nightshift hours are 1800 – 0600 hours. Contract medical shift hours are the same as the facility security staff and civilian support staff hours are 0800 – 1700 hours. At the time of the audit, the facility has 227 staff employed at the facility who have contact with inmates.

Twenty-twenty specialized staff interviews were conducted and were selected based upon their work assignment and subject matter expertise. Interviews were conducted in designated rooms that provided privacy and all interviews were conducted without interruption.

At the time of the audit, the facility had 137 contractors and 146 volunteers authorized to enter the facility and who may have contact with inmates. Interviews with staff were conducted in designated rooms that provided privacy and were all completed without interruption.

All staff interviews were conducted in accordance with the National PREA Resource Center PREA Compliance Audit Instruments Interview Guide. Upon arrival to the facility, the Auditor requested an updated employee roster to assist with the selection process for the random and targeted staff interviews. A detailed list and quantities for each interviewed are listed below:

Staff Categories	Number of Interviews Conducted
Random Sample of Staff:	20
Agency and PREA Staff:	
Agency Head or Designee	1
Facility Warden	1
PREA Coordinator	1
PREA Compliance Manager	1
Specialized Staff:	
Agency Contract Administrator	1
Administrative Staff	1
Designated Staff Monitors Retaliation	1
Education & Program Staff for Youthful Inmates	1
Investigative Staff	1

Incident Review Team	1
Intake Staff	1
Intermediate or Higher Level Facility Staff	2
Line Staff who Supervise Youthful Inmates	1
Medical Staff	2
Mental Health Staff	1
SANE / SAFE Staff	1
Rape Crisis / Advocacy Center Staff	1
Security Staff - First Responders	2
Staff who Perform Screening for Risk of SV	3
Staff who Supervise Inmates in Segregated Housing	1
Volunteers / Contractors	2
Total Random Staff Interviewed	20
Total Agency and PREA Staff	4
Total Specialized Staff Interviewed	23
Total Staff Interviewed	47

### **Inmate Interviews**

The inmate count on the first day of the audit was 523. In accordance with the PREA Auditor Handbook Table 1: Required Number of Inmate Interviews, the Auditor was required to conduct fifteen random sample inmate interviews. All inmate interviews were conducted in accordance with the National PREA Resource Center, PREA Compliance Audit Instrument - Interview Guide.

The Auditor conducted twenty-one random samples of inmate interviews. The Auditor requested an up-

to-date inmate roster (in alphabetical order) from every housing dormitory and selected every tenth inmate from the inmate rosters provided; inmates interviewed included every housing dormitory and inmates of various diversities.

In accordance with the PREA Auditor Handbook Table 1: Required Number of Inmate Interviews, the Auditor was required to interview at least fifteen-targeted inmates. The Auditor conducted twelve targeted inmate interviews. The facility provided documentation confirming they did not have the following targeted inmate categories housed at their facility at the time of the on-site review. As a result, these categories of inmates were not interviewed.

- Inmates who reported sexual victimization at intake
- Inmates in segregated housing for high risk of sexual victimization
- Inmates who reported sexual abuse
- Inmates who identify as Transgender or Intersex

Charlotte County Sheriff's Office reported during the twelve months prior to the audit, there were no allegations of retaliation reported and there were no inmates placed in segregated housing due to risk of sexual victimization. Additional, inmates who reported sexual abuse in the 12 months prior to the audit and inmates who identify as Transgender were no longer in custody of the Charlotte County Sheriff's Office during the on-site phase of the audit. Therefore, these targeted categories of inmates were not interviewed.

All inmate interviews were conducted in accordance with the National PREA Resource Center PREA Compliance Audit Instruments Interview Guide. The Auditor requested an updated facility inmate roster to assist with the selection process for the random and targeted inmate interviews. All interviews were conducted in private and without interference. A detailed list and quantities for each interviewed are listed below:

Inmate Categories	Number of Interviews Conducted
Random Sample of Inmates	21
Targeted Inmates:	
Inmates with a cognitive / physical disability	1
Inmates who are blind, deaf, or hard of hearing	1
Inmates who are Limited English Proficient	3
Inmates who identify as lesbian, gay, or bisexual	6
Youthful Inmate	1
Total Random Inmates Interviewed	21
Total Targeted Inmates Interviewed	12
Total Inmates Interviewed	33

### **On-site Documentation Review**

According to the information provided in the PAQ (§115.22(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported sixteen allegations of sexual abuse and sexual harassment. During the on-site phase of the audit, the Auditor met with the PREA Coordinator and the staff member tasked with entering the information into the PAQ to clarify the discrepancy. The nine additional incidents were initially reported in the Jail Management System as a sexual abuse or sexual harassment incident; however, after reviewing the nine incidents it was determined the incidents did not meet the criteria of a sexual abuse or sexual harassment incident. Therefore, for the purpose of this report, the total number of allegations of sexual abuse and sexual harassment are seven.

During the on-site phase of the audit, the Auditor reviewed the seven allegations included six sexual harassment allegations and one sexual abuse allegation. The six sexual harassment allegations included one all staff-on-inmate allegation, which was closed as unfounded, and five inmate-on-inmate allegations which were closed as unsubstantiated. The one sexual abuse allegation was an inmate-on-inmate allegation that was closed as unfounded.

The Auditor reviewed six administrative investigations and one criminal investigations. All of these cases were selected and reviewed based upon the outcome and the Auditor's requirement to review all of the required steps and processes to verify compliance with multiple PREA Standards. Upon completion of reviewing all case files, the Auditor determined that the facility (to include but not limited to Investigators, Staff First Responders, Medical and Mental Health, PREA Compliance Manger, Supervisory Staff, etc.) followed the required steps and processes for all reported allegations.

Each administrative and criminal investigative case reviewed by the Auditor, contained all documented reports for that specific incident, an inmate body chart, inmate notifications, a description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and findings. Additionally, each completed report included an assessment as to whether staff actions or a failure to act on the part of staff contributed to the abuse. The Auditor reviewed each case thoroughly and systematically to ensure each case contained all of the correct procedures, completed documentation, and that all processes were completed as required, to include the report findings for the closed cases.

Employee personnel files are maintained in the Human Resources Department at the agency's Central Office. Employee criminal background checks and training records are maintained in the employee personnel files. The Auditor reviewed documentation from twelve employee personnel files. The Auditor selected files of a newly hired employee, long-term staff members, recently promoted staff members, and employees with specialized training. All files reviewed contained the required training documentation, revealed thorough background investigations, and included updated documentation of current background investigations (five-year intervals) of current staff members.

The Auditor reviewed thirteen inmate records. These records were selected based upon the inmate sexual abuse investigations, length at facility, and inmates that disclosed sexual orientation as bisexual, gay, or transgender. Each file contained the initial risk screening form as well as the 30-day reassessment form; all were filled out completely and in accordance to the facility's policy. In the 12 months prior to the audit, the facility reported there were eleven inmates who disclosed prior sexual victimization during the risk screening process. During the on-site phase of the audit, the Auditor conducted interviews with five inmates who disclosed prior sexual victimization during the risk screening process.

Medical and mental health files are maintained in a secured section of the medical office. The Auditor reviewed thirteen secondary medical and mental health files. These files were reviewed based upon the screening for risk of sexual victimization, inmates who reported sexual abuse or sexual harassment, and those inmates who identify as gay or bisexual. Medical files also contain a body chart, which is a form that is completed by medical staff when an inmate reports either a sexual harassment or sexual abuse allegation.

The list below details the documentation reviewed from the various files:

Type of File	Number of Files Reviewed
Investigative Case Files	7
Human Resources files	12
Inmate Records	13
Medical & Mental Health files	13
Total Number of files reviewed	45

### **Exit Briefing**

At the conclusion of this audit, an exit meeting was held with the Facility Warden, Major, Captains, Watch Commanders, PREA Compliance Manager, PREA Coordinator, and a multitude of Facility Supervisors and Staff to discuss the audit findings. The Auditor informed all in attendance the need to review on-site observations, documentation, and interview responses in order to determine compliance for each standard and provision.

## AUDIT FINDINGS

### Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

### Facility Characteristics

The Charlotte County Sheriff's Office Detention Center is located at 26601 Airport Road, in Punta Gorda Florida. Punta Gorda Florida is located along the Gasparilla Sound - Charlotte Harbor, approximately 24 miles north of Fort Meyers Florida.

The rated capacity of Charlotte County Sheriff's Office is 1074 with an average daily population (ADP) of 616 for the 12 months preceding the audit. The inmate population on the first day of the audit was 911.

The Charlotte County Sheriff's Office Detention facility is a direct supervision jail with sixteen housing areas to include open bay housing areas, multiple occupancy cell housing areas, work release unit, segregation housing area, medical infirmary, and a juvenile unit. A direct supervision jail requires an officer to be stationed inside the housing unit. This concept encourages direct interaction between staff and inmates to prevent negative behavior. The current layout of the facility groups inmates into living units that can house up to sixty-four inmates.

The building also has an Admission and Release area, Classification offices, designated courtroom, and Supervisory Staff Offices are located strategically throughout the facility. There is also a designated inmate laundry area, facility maintenance room, and the facility kitchen.

The multi-storied infirmary is designed to have separation between clinic areas, medical inmates, and psychological treatment inmates. The first floor of the infirmary provides medical care for all inmates. Medical treatment includes dental, x-ray, and external vendors for ultrasound and dialysis. The second floor is designed for medical treatment inmates. All the cells are negative pressure cells. The third floor houses inmates that are under the care and treatment of Mental Health Practitioners. All cells have cameras that are monitored continuously.

Charlotte County Sheriff's Office reported 266 cameras installed and operational. Of the total 266 cameras, 236 are located in the interior and 30 cameras are strategically placed on the exterior of the building. The interior cameras are located in the facility lobby, throughout the facility hallways, multiple cameras in housing areas, program and educational areas, and intake and transfer. Exterior cameras

are installed in all the exterior walkways and entrances and along the outside perimeter.

There are two security staff shifts. Dayshift hours are 0600 – 1800 hours and nightshift hours are 1800 – 0600 hours. Contract medical shift hours are the same as the facility security staff and civilian support staff hours are 0800 – 1700 hours. At the time of the audit, the facility has 243 staff employed at the facility who have contact with inmates.

Medical and Mental Health Staff are contracted with Prison Health Services (Corizon). Contract medical shift hours are the same as the facility security staff. The facility provides various mental health services and programs. The Food Service Department and the inmate canteen service is contracted with Aramark Services, Inc.

The PAQ indicated there are 137 contractors and 146 volunteers. Examples of volunteer services provided at the facility include Chaplain, Alcoholics Anonymous, Narcotics Anonymous, General Education Development, Anger Management, Parenting, Jobs for Life, and various worship services and religious programs.

The facility operates a hydroponic and aquaculture program for inmates to learn job related skills and to provide appropriate work-related behavior.

<b>AUDIT FINDINGS</b>	
<p><b>Summary of Audit Findings:</b></p> <p>The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy ). Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
<b>Number of standards exceeded:</b>	5
<b>Number of standards met:</b>	40
<b>Number of standards not met:</b>	0
<p>Standards Exceeded: 115.33; 115.42; 115.51; 115.67; 115.86</p> <p>Standards Met: 115.11; 115.12; 115.13; 115.14; 115.15; 115.16; 115.17; 115.18; 115.21; 115.22;  115.31; 115.32; 115.34; 115.35; 115.41; 115.43; 115.52; 115.53; 115.54; 115.61; 115.62; 115.63;  115.64; 115.65; 115.66; 115.68; 115.71; 115.72; 115.73; 115.76; 115.77; 115.78; 115.81; 115.82;  115.83; 115.87; 115.88; 115.89</p> <p>Standards Not Met: N/A</p>	

## Standards

### Auditor Overall Determination Definitions

- Exceeds Standard  
(Substantially exceeds requirement of standard)
- Meets Standard  
(substantial compliance; complies in all material ways with the stand for the relevant review period)
- Does Not Meet Standard  
(requires corrective actions)

### Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Detention Bureau Organizational Chart</p> <p>Interviews conducted with:</p> <p>PREA Coordinator</p> <p>PREA Compliance Manager</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the policy of CCSO is to establish zero-tolerance policy toward sexual abuse and sexual harassment of inmates and sexual acts involving inmates regardless of consensual status. Inmates and staff have a right to be free from sexual abuse and sexual harassment.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states to address the safety, prevention, detection, response, and treatment needs of inmates who have been sexually battered, the agency has a policy to investigate, discipline, and prosecute those who sexually batter/abuse inmates. Any employee, contractor, or volunteer who engages in sexual abuse will be prohibited from contact with inmates and investigated in accordance with agency policy.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states it is the policy of the CCSO, to report all incidents of sexual battery/abuse immediately for investigation. The CCSO has members trained to investigate allegations of sexual battery/assault and to collect and process forensic evidence.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> clearly defines prohibited behaviors regarding sexual abuse and</p>

sexual harassment. In addition, any inmate, employee, volunteer, or contractor who commits a sexual battery may be criminally prosecuted pursuant to chapter 794, Florida Statute.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states the Charlotte County Sheriff's Office Detention Bureau has designated the Administrative Services Commander as the PREA Coordinator. The PREA Coordinator, in conjunction with the PREA Compliance Manager, is responsible to develop, implement, and oversee agency efforts to comply with PREA Standards. The PREA Coordinator will report directly to the CCSO Detention Bureau Commander on all PREA related matters.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator who verified she has sufficient time and authority in her position to accomplish PREA responsibilities for the agency. The PREA Coordinator reports directly to the CCSO Detention Bureau Commander. A review of the CCSO organizational chart provided evidence that the agency has designated an upper-level position as the PREA Coordinator.

During the on-site phase of the audit, the Auditor interviewed the PREA Compliance Manager and verified she has sufficient time and authority in her position to accomplish the PREA responsibilities. Evidence shows that the Charlotte County Sheriff's Office has designated a facility PREA Compliance Manager as verified through a review of the CCSO Detention Bureau organizational chart and through interviews with the PREA Compliance Manager and the PREA Coordinator.

During the on-site phase of the audit, the Auditor interviewed the Facility Warden, confirmed the responsibilities of the PREA Compliance Manager, and verified she is provided sufficient time and authority in her position to accomplish these responsibilities.

Upon review of the policy and the agency organizational chart and upon completion of interviews conducted with the PREA Coordinator, PREA Compliance Manager, and Facility Warden during the on-site visit, the Charlotte County Sheriff's Office has demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1382 589">Charlotte County Sheriff's Office <i>Memorandum of Understanding</i> with Manatee County Sheriff's Office</p> <p data-bbox="248 781 596 817">Interviews conducted with:</p> <p data-bbox="248 857 651 893">Agency Contract Administrator</p> <p data-bbox="248 1001 1485 1332">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states it is the policy of the CCSO to house inmates outside the county only when necessary to maintain compliance with minimum housing standards as set forth in the Florida Model Jail Standards and Florida Corrections Accreditation Commission. All contracts for the confinement of inmates with other private or governmental agencies will include the entity's obligation to adopt and comply with Prison Rape Elimination Act standards. All efforts will be exhausted to ensure the entity selected to house inmates meets all standards set forth in the Prison Rape Elimination Act.</p> <p data-bbox="248 1449 1481 1695">During the on-site phase of the audit, the Auditor conducted an interview with the Agency Contract Administrator regarding how contracts are monitored to determine if the contractor complies with the PREA requirements of the contract. The Agency Contract Administrator explained that any Charlotte County Sheriff's Office contract includes verbiage related to the entity's obligation to comply with the PREA Standards prior to entering into agreement with the agency. If the entity is not PREA compliant, the contract will not be executed.</p> <p data-bbox="248 1807 1485 2054">The Agency Contract Administrator informed the Auditor the Charlotte County Sheriff's Office currently has one existing contract for the confinement of inmates with the Manatee County Sheriff's Office. According to information posted on the Manatee County Sheriff's Office webpage, the Manatee County Sheriff's Office last PREA Audit was completed in August 2017 and were found in compliance. Additionally, the Auditor has direct knowledge that the Manatee County Sheriff's Office next PREA Audit is scheduled for September 2020.</p>

Upon review of the policy and upon completion of the interview with the Agency Contract Administrator, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.13	<b>Supervision and monitoring</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p><i>Charlotte County Sheriff's Office Detention Bureau 2019 PREA Assessment Report (2017 – 2019)</i></p> <p>Facility Blueprint (to include security cameras and security mirrors)</p> <p>Facility Housing Logs (all shifts) Unannounced Rounds</p> <p>Interviews conducted with:</p> <p>Warden or Designee</p> <p>PREA Coordinator</p> <p>PREA Compliance Manager</p> <p>Intermediate or Higher Level Facility Staff</p> <p>On-site Review Observations:</p> <p>Daily operational functions</p> <p>Staff interaction with inmates</p> <p>Inmate movement</p> <p>Supervisory staff conducting rounds</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states in order to identify and deter staff sexual abuse and sexual harassment, a supervisor, on each shift, will conduct and document daily and weekly-</p>

unannounced tours of the facility. Daily tours will be documented in Jail Management System and weekly tours will be documented on a Jail Tour form. Unannounced tours will be conducted during the day and night shift. Members are prohibited from alerting other staff members that these supervisory rounds are occurring.

During the pre-on-site phase of the audit, the Auditor reviewed the *Charlotte County Sheriff's Office 2019 PREA Assessment Report*. Upon review of the facility's PREA Assessment Report, when reviewing staffing requirements and the appropriate numbers of assigned staff, the agency took into consideration the following requirements:

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacy;
- Any inadequacy from internal or external oversight bodies;
- Any findings of inadequacy from Federal investigative agencies;
- All the components of the facility's physical layout (including blind spots);
- Composition of inmate population;
- Number of and placement of supervisory staff;
- Institution programs specific to each shift;
- All applicable State or local laws;
- Prevalence of substantiated and unsubstantiated incidents of sexual abuse;
- Any other relevant factors.

The *CCSO Detention Bureau 2019 PREA Assessment Report* was extremely detailed and specific in each of the above categories.

Charlotte County Sheriff's Office Detention Bureau provides direct supervision for a maximum of 1,074 inmates – local, state, and federal. The average daily number of inmates on which the facility-staffing plan was predicated on was 634. There were no deviations from the staffing assessment during the twelve months prior to the audit.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden regarding CCSO Detention Bureau 2019 PREA Assessment Report. The Facility Warden discussed how the Detention Bureau develops a staffing assessment plan that documents the required daily staffing levels. Additionally, when developing a staffing plan, several items are taken into consideration such as internal reviews, components of the physical plant, composition of the inmate population, the prevalence of substantiated and unsubstantiated allegations of sexual abuse, inmate-on-inmate assaults, and uses of force. The Facility Warden also explained that video monitoring is also taken into consideration. CCSO Detention Bureau has 236 video cameras installed throughout the facility and an additional 30 cameras on the exterior of the facility; all cameras are reviewed on a regular basis. To ensure compliance with the staffing plan, the Facility Warden and all supervisory staff conduct rounds on the compound for visual verification of staff assignments throughout

the compound. The Facility Warden confirmed there were no deviations from the staffing plan during the twelve months prior to the audit.

During the on-site phase of the audit, the Auditor conducted interviews with the PREA Compliance Manager and the PREA Coordinator; both confirmed the process of developing a staffing plan previously described by the Facility Warden. The PREA Coordinator also confirmed that an assessment of the facility-staffing plan is conducted annually and she is consulted regarding any adjustments to the staffing plan.

During the on-site phase, the auditor reviewed the average daily number of inmates' report, staff shift rosters, facility blueprint, and daily inmate activity schedules to verify adequate staff coverage in comparison to inmate population, inmate movement, and facility size and layout.

The Auditor reviewed housing logs of supervisor unannounced rounds and verified the unannounced rounds are being conducted and documented in accordance to the facility Post Order and the PREA Standard. The sample of housing logs reviewed covered several days and were from every shift. In the samples reviewed, the Auditor did not find any consistent patterns or inadequacies.

During the on-site phase of the audit, the Auditor conducted supervisory level staff interviews and inquired how unannounced rounds are completed without staff knowledge. Supervisory level staff indicated this is completed by observing staff movement, monitoring radio transmissions, alternating movement patterns or being unpredictable with times or walking pattern, and listening to staff conversations while conducting rounds throughout the facility.

During the on-site phase of the audit, the Auditor toured the facility and observed the daily operational functions, staff interacting with inmates, general inmate movement, inmates out at recreation, inmates participating in programs, inmates completing job assignments, and supervisory staff conducting rounds. These observations provided additional verification of policy and of standard compliance.

Upon review of the policies and documentation provided and upon completion of interviews conducted with the Facility Warden, PREA Coordinator, PREA Compliance Manager, and Intermediate or Upper-level Supervisory Staff during the on-site visit, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.14	<b>Youthful inmates</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>Documents:</p> <p>Charlotte County Sheriff's Office Detention Procedure P-11-043, <i>Juveniles</i></p> <p>Interviews conducted with:</p> <p>Education and Program Staff who work with Youthful Inmates</p> <p>Line Staff Who Supervise Youthful Inmates</p> <p>Youthful Inmate</p> <p>Charlotte County Sheriff's Office Detention Procedure P-11-043, <i>Juveniles</i> states the CCSO Detention Bureau maintains a housing area for juveniles adjudicated as adults. All other juvenile detentions are handled by the Department of Juvenile Justice.</p> <p>Charlotte County Sheriff's Office Detention Procedure P-11-043, <i>Juveniles</i> states sufficient staff will be scheduled at all times to monitor, supervise, and ensure that juveniles are kept separate from adult inmates and other juvenile inmates of different classifications.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with one youthful inmate (the CCSO Detention Bureau reported one youthful inmate in custody). The interview was conducted with the guidance of the National PREA Resource Center, <i>PREA Compliance Audit Instrument - Interview Guide for Inmates</i>. The youthful inmate confirmed his assigned housing area provides no direct contact with adult inmates as well as providing sight and sound separation from adult inmates. The youthful inmate also confirmed that when outside the assigned housing area for classes, exercising, or programs, there is no direct contact with adult inmates.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with education and program staff who work with youthful inmates. Education and Program Staff confirmed the youthful inmate is provided with daily opportunities, and regularly participates in education and programs. The Education and Program Staff also confirmed that the requirement for sight and sound separation between youthful and adult inmates does not interfere with the youthful inmate attending/participating in such programs.</p>	

During the on-site phase of the audit, the Auditor conducted an interview with line staff who supervise youthful inmates. Line Staff who supervise youthful inmates confirmed that the CCSO Detention Bureau has a dedicated youthful inmate housing pod, which provides sight, sound, and separation from adult inmates. Line Staff also confirmed that youthful inmates have daily access to education, programs, and recreation opportunities.

During the on-site phase of the audit, the Auditor toured the youthful inmate-housing pod and confirmed it provides sight, sound, and separation from adult inmates. Youthful inmates are not placed in solitary confinement in an effort to comply with this requirement, as the facility provides a dedicated housing pod strictly for the housing of youthful inmates.

Upon review of the policy, completion of the interviews with facility staff, and completion of a facility tour, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Detention Procedure P-11-039, <i>Housing Unit Management</i></p> <p>Charlotte County Sheriff's Office Detention Procedure P-08-034, <i>Inmate Searches</i></p> <p>Charlotte County Sheriff's Office Detention Procedure P-08-042, <i>Transgender/Intersex Inmates</i></p> <p>Charlotte County Sheriff's Office PREA Training Curriculum / Records</p> <p>Staff Roster</p> <p>Staff Schedules</p> <p>Interviews conducted with:</p> <p>Facility Warden</p> <p>PREA Compliance Manager</p> <p>Random sample of Inmates</p> <p>On-site Review Observations:</p> <p>Daily operational functions</p> <p>Staff interaction with inmates</p> <p>Inmate movement</p> <p>Charlotte County Sheriff's Office Detention Procedure P-08-034, <i>Inmate Searches</i> states strip searches of inmates will be conducted in private by an officer of the same gender as the person being searched. Only staff members necessary for security purposes will be present</p>

during the search. Strip searches will be performed on adult and juvenile arrestees in the same manner and in accordance with F.S.S. 901.211.

Charlotte County Sheriff's Office Detention Procedure P-08-034, *Inmate Searches* states strip searches, or visual body cavity searches of cross gender inmates will only be conducted in exigent circumstances by medical staff, which will be documented and forwarded to the Watch Commander for approval. Cross-gender pat-down searches of female inmates will be documented.

During the pre-on-site phase of the audit, the Auditor reviewed the provided documentation to include shift schedules, shift rosters, and daily inmate activity schedule. During the on-site phase of the audit, the Auditor compared the information reviewed with her observations made during the facility tour and noted the number of female staff members is more than adequate and covers all shifts.

During the on-site phase of the audit, the Auditor observed the facility operations throughout the day, to include continuous inmate movement throughout the facility, continuous physical interactions between staff and inmates, and inmates performing job assignments throughout the facility. The Auditor also observed opposite gender announcements being conducted throughout the facility tour.

Charlotte County Sheriff's Office Detention Procedure P-11-039, *Housing Unit Management* states that male and female inmates will be kept separated by normal sight, sound, and are housed separately. Female Housing Deputy will supervise female housing units and accompany any male staff entering a female housing unit. A certified female deputy is on duty at all times where female inmates are housed.

Charlotte County Sheriff's Office Detention Procedure P-08-034, *Inmate Searches* states at times when it is necessary for a staff member to enter a housing area of the opposite gender, the inmates will receive a verbal announcement that a male/female is entering.

During the on-site phase of the audit, the Auditor conducted a review of several samples of housing logs and observed entries indicating opposite gender entering housing dormitory with notification to inmates being announced prior to opposite gender entry. The sample of housing logs reviewed covered several days throughout the month and were from all shifts. The Auditor also observed the announcement of an opposite gender entering a housing dormitory throughout the on-site tour of the facility, which provided additional documentation and the facility's compliance with this standard.

During the on-site phase of the audit, the Auditor requested interviews with a random sampling of inmate. Twenty-one random sample of inmate interviews were completed and of the twenty-one randomly selected, six interviews were conducted with female inmates.

Of the twenty-one random sample of inmate interviews completed, all twenty-one inmates confirmed they have privacy while showering, changing clothes, or using the bathroom facilities. Additionally, all twenty-one random sample of inmates interviewed, confirmed staff of the opposite gender announce his/her presence prior to entering the housing unit. The Auditor inquired to each female inmate interviewed if she has ever been unable to participate in activities outside the housing area due to female staff being unavailable to conduct pat-down searches. All six female inmates denied ever being refused the opportunity to participate in activities with all six responding that a female staff member is always present and available.

Charlotte County Sheriff's Office Detention Procedure P-08-042, *Transgender/Intersex Inmates* states staff shall not search or physically examine (strip search) a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. Staff shall interview transgender or intersex inmate in a professional, respectful manner to determine the least intrusive search possible, yet consistent with the facility's security needs as well as the safety of inmates. The inmate may make request for specific gender of officer to conduct the search.

Charlotte County Sheriff's Office Detention Procedure P-08-042, *Transgender/Intersex Inmates* states questions related to sexual identity, gender identity, or gender expression shall be conducted in accordance with the Prison Rape Elimination Act and will be conducted privately, in a professional manner, to preserve the confidentiality as well as human dignity and avoid subjecting the inmate to abuse, humiliation, or ridicule.

During the pre-on-site phase of the audit, the Auditor reviewed documentation provided by the facility showed the facility has had zero searches of a transgender or intersex for the sole purpose of determining the inmate's genital status during the twelve months prior to the audit. Additionally, documentation provided by the facility indicated there were no cross-gender strip searches or cross-gender visual body cavity searches conducted during the last 12 months.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and the PREA Coordinator confirmed that during the twelve months prior to the audit, the facility had no searches of transgender or intersex inmates for the sole purpose of determining the inmate's genital status. The Facility Warden and the PREA Coordinator also verified that no cross-gender strip searches or cross-gender visual body cavity searches were conducted during the twelve months prior to the audit.

During the on-site phase of the audit, the Auditor requested an inmate roster for transgender or intersex inmates to conduct targeted interviews. At the time of the on-site phase of the audit, the facility reported there were no transgender inmates in custody.

Charlotte County Sheriff's Office Detention Procedure P-08-034, *Inmate Searches* states all staff members shall receive training on how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates/offenders in a professional, respectful, and least intrusive manner possible.

During the on-site phase of the audit, the Auditor reviewed the training records and training curriculum provided to staff members who may have contact with inmates, how to perform cross-gender pat-down searches and searches of transgender and intersex inmates. Training records indicated staff members receive training on the agency's PREA policies and how to perform cross-gender pat-down searches annually. The training curriculum outlined the agency's policy on cross-gender pat-down searches and searches of transgender and intersex inmates, policy prohibiting search of inmates for the sole purpose of determining the inmate's genital status, defining exigent circumstances, and conducting searches in a professional and respectful manner.

Upon review of staff training records and training curriculum, observations during the on-site visit, and information obtained from the random inmate interviews, and staff interviews during the on-site phase, the Charlotte County Sheriff's Office, demonstrated facility-wide practices that are consistent with policy and with the requirements of the PREA standard.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Contract with Language Line Services</p> <p>Charlotte County Sheriff's Office Inmate Informational Handout</p> <p><i>The Center for Abuse &amp; Rape Emergencies</i> - PREA / Sexual Assault Brochures (multiple languages)</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Inmates with Disabilities or LEP</p> <p>Random sample of Staff</p> <p>On-site Review Observations:</p> <p>PREA informational signage posted in multiple languages</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates with special needs, limited English proficiency or disabled to include, deaf, hard of hearing, blind or have low vision of those who have intellectual, psychiatric, or speech disabilities are provided 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. Information on the policies on sexual battery/abuse and the method for reporting such is provided in written format, as well as verbally by a staff member. Access to interpreters who can interpret effectively, accurately, and impartially is also available. Another inmate shall never be used as a translator or interpreter.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head regarding how the facility takes appropriate steps to ensure that all inmates have an</p>

equal opportunity to participate in the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Agency Head detailed the efforts made by the facility to ensure impaired inmates are provided opportunities and benefits equal to those of unimpaired inmates. Inmates with either disabilities or LEP inmates are provided with alternatives to accommodate participation in the PREA program such as videos and brochures tailored to their primary language. Additionally, every effort is made to provide all training in a format that will be easily understood by inmates who have a physical or developmental impairment or who have limited English proficiency.

PREA training for inmates is provided in a video format that is also closed-captioned to accommodate the hearing impaired. If an inmate is identified with a developmental impairment, training is provided through the video with additional instruction if the inmate indicates he has questions.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmates shall not be used as interpreters. During the pre-on-site phase of the audit, the Auditor reviewed the existing contract between the Charlotte County Sheriff's Office and the Language Line Services, Inc. The contract outlines the translation services provided for the facility, rate of service, and the contract start and ending dates.

The Auditor was also able to confirm compliance with Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* during the on-site visit facility tour when Intake and Release Staff demonstrated the process utilized when communicating with an inmate who is LEP, deaf, or disabled. Staff provided a thorough demonstration of providing all the required PREA information to include the zero tolerance policy, how to report an incident of sexual abuse or sexual harassment, counseling services, and programs available.

During the on-site phase of the audit, the Auditor conducted interviews with a random sample of staff. Each staff member confirmed the agency policy prohibiting the use of an inmate to provide translation services; all staff members acknowledged the use of either the language line or contacting another staff member to translate.

During the on-site visit, the Auditor interviewed five targeted inmates with physical or cognitive disabilities, LEP, or hearing impaired. Each inmate acknowledged receiving PREA information during the intake / transfer process. Each inmate described receiving the comprehensive PREA orientation within the first day or two after arriving to the facility. Additionally, inmates acknowledged the information was provided to them in an accessible format specific to their individual needs.

During the on-site phase of the audit, the Auditor conducted a tour of the facility and observed PREA Zero Tolerance informational bulletins posted in every housing area as well as various locations throughout the compound. These PREA bulletins are posted in multiple languages, located near the phones banks inside the housing areas, as well as several posted in common areas throughout the facility.

Charlotte County Sheriff's Office issues each inmate a smart tablet to keep in his/her possession throughout his or her incarceration. The tablets contains the PREA informational handout, an in-depth brochure that discusses prevention methods, confidentiality, reporting methods, available treatment and counseling, and the investigative process. Additionally, the tablet also has the informational brochure from The Center for Abuse and Rape Emergencies (C.A.R.E. Center) the as well as providing inmates a reporting method for allegations of sexual abuse or sexual harassment. This brochure discusses the services provided by the C.A.R.E. Center and methods to contact (PREA Helpline) or mailing address.

Upon review of the policies, PREA informational handout (for inmates), C.A.R.E. Center brochure, and upon completion of the targeted interviews with inmates, and the informal interviews with facility staff, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="252 168 896 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 411 358">Documents:</p> <p data-bbox="252 398 1232 432">Charlotte County Sheriff's Office General Order 3.05, <i>Selection Procedures</i></p> <p data-bbox="252 472 1426 548">Charlotte County Sheriff's Office General Order 13.30, <i>Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 734 596 768">Interviews conducted with:</p> <p data-bbox="252 808 772 842">Administrative / Human Resources Staff</p> <p data-bbox="252 954 639 987">On-site Review Observations:</p> <p data-bbox="252 1028 443 1061">Personnel files</p> <p data-bbox="252 1173 1481 1339">Charlotte County Sheriff's Office General Order 3.05, <i>Selection Procedures</i> states the Sheriff's Office shall not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who has engaged in sexual abuse in a prison, jail, lockup, community confinement, juvenile facility, or other institution (as defined in 42 U.S.C. 1997).</p> <p data-bbox="252 1451 1481 1659">Charlotte County Sheriff's Office General Order 3.05, <i>Selection Procedures</i> states the Sheriff's Office shall not hire or promote anyone 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, or has been civilly or administratively adjudicated to have engaged in such activity.</p> <p data-bbox="252 1771 1481 2101">Charlotte County Sheriff's Office General Order 3.05, <i>Selection Procedures</i> establishes responsibilities, policies, and procedures governing background investigations. A background investigation of each candidate is conducted prior to appointment. All investigations include the verification of a candidate's qualifying credentials; a review of a candidate's former employers and any criminal record to include a warrants check; local records check, fingerprint check; verification of the applicant's education, a review of relevant national or state decertification resources if available and the verification of at least three personal and professional references.</p>

Charlotte County Sheriff's Office General Order 17.06, *Sexual Abuse/Battery Prevention & Intervention* states criminal background records checks shall be conducted by the Communications Manager at least every five years of current employees, volunteers, and contractors who may have contact with inmates.

During the on-site phase of the audit, the Auditor conducted an interview with the agency's Administrative / Human Resources personnel who confirmed the agency conducts the required criminal background checks prior to hiring a new employee, employees who are considered for promotions, or enlisting the services of a contractor or volunteer and at least once every five years. The HR Staff Member confirmed the CCSO requirement imposed upon all employees to disclose any previous misconduct and the agency's requirement to provide information regarding a former employee upon request of another institution or agency. In addition, the HR Staff Member also confirmed the agency utilizes FALCON Integrated Criminal History System. FALCON is the Florida Department of Law Enforcement's (FDLE) state-of-the-art system for identifying criminals and reporting data.

Charlotte County Sheriff's Office reported, in the 12 months prior to the audit, forty-four criminal background checks were performed of persons hired or promoted who may have contact with inmates. During the on-site visit, the Auditor reviewed twelve personnel files of new hires, employees with tenure, employees recently promoted, and those with specialized training. Each file contained the required documentation to include thorough background investigations, which were completed as required and in accordance to Charlotte County Sheriff's Office General Order 17.06.

Upon review of the policies and review of personnel files and upon completion of the interview conducted with the Human Resources Staff, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Facility Site Map &amp; Security Camera Schematic Report</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Facility Warden</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the facility will use video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. Annually, the facility will assess the feasibility of and need for new or additional monitoring technology and/or equipment. The Detention Bureau Commander will have an annual review of the facility to assess the need for additional cameras. The Detention Bureau Commander will then develop a plan of action to acquire and implement any additional equipment based upon the current resources available or planning for the future available resources.</p> <p>During the on-site tour of the facility, the Auditor observed convex mirrors, security cameras, and video monitoring equipment in all housing areas, food service, laundry, intake and release, and in common areas, and outside throughout the grounds of the compound. The Charlotte County Sheriff's Office reported no modifications or expansions to the facility since the last audit. The Auditor did not observe any blind spots during the facility tour.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head and discussed if the agency considers how modifications or expansions to a facility effects the ability to protect inmates from sexual abuse. The Agency Head explained how facility modification has always been focused on providing safety to both staff and inmates. The Agency Head also explained how video cameras at the facility are installed in all housing units, common areas, food service, and laundry.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Facility</p>

Warden. During the interview, the Facility Warden confirmed that prior to designing or acquiring any new facility or when planning any substantial expansion or modification, of existing facilities, the facility shall consider the effect of the design, acquisition, expansion, or modification might have upon the facility's ability to protect inmates from sexual abuse. The Facility Warden also confirmed that prior to the installation of the additional cameras the facility shall considered how the addition of such technology would enhance the agency's ability to protect inmates from sexual abuse.

The Facility Warden also informed the Auditor, both video and audio surveillance is regularly reviewed to ensure compliance with requirements for security checks and proper implementation of all security and safety procedures. During the twelve months prior to the audit, the Charlotte County Sheriff's Office has added additional video and audio surveillance devices for the specific purpose of improving the ability to prevent and respond to sexual abuse incidents.

Upon review of the policy and the Facility Site Map, Security Camera Schematic report, and upon completion of the interviews conducted with the Agency Head and the Facility Warden, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office General Order 11.21, <i>Sexual Violence/Battery</i></p> <p>Charlotte County Sheriff's Office Detention Procedure P-11-032, <i>Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office contract with Prison Health Services &amp; Columbia Fawcett Memorial Hospital</p> <p>Charlotte County Sheriff's Office contract with the Center for Abuse &amp; Rape Emergencies, Inc.</p> <p>State of Florida, <i>Sexual Assault Kit Form for Healthcare Providers Forensic Exam Protocol</i></p> <p>Charlotte County Sheriff's Office Sexual Abuse Awareness Brochure</p> <p>Interviews conducted with:</p> <p>Random sample of Staff</p> <p>SANE/SAFE Staff</p> <p>Investigative Staff</p> <p>PREA Compliance Manager</p> <p>PREA Coordinator</p> <p>On-site Review Observations:</p> <p>Sexual Abuse / Harassment Reporting Procedures poster</p> <p>Inmate phones located in each dormitory</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Charlotte County Sheriff's Office is the law enforcement</p>

agency who has the legal authority and responsibility for investigating allegations of sexual battery/assault.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states it is the policy of the Charlotte County Sheriff's Office Detention Bureau to report all incidents of sexual battery/abuse immediately to Charlotte County Sheriff's Office Major Crimes Unit for investigation. The Charlotte County Sheriff's Office Major Crimes Unit has members trained to investigate allegations of sexual abuse/assault and to collect and process forensic evidence.

Charlotte County Sheriff's Office Detention Procedure P-11-032, *Sexual Abuse/Battery Prevention & Intervention* states inmates who are victims of sexual battery/assault, shall be treated immediately for any life threatening injuries. Inmates shall be taken to the medical facility as directed by the investigator assigned to the case, where a forensic medical exam will be conducted. Inmates shall be informed of their rights as a victim and will not be charged for any forensic medical exam that has been ordered.

During the pre-on-site phase of the audit, the Auditor established that investigators with the Charlotte County Sheriff's Office follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceeding and criminal prosecutions.

During the on-site phase of the audit, the Auditor conducted an interview with an investigator assigned to the Charlotte County Sheriff's Office Major Crimes Unit who confirmed the responsibilities of an investigator, reviewed the process of an investigation, and confirmed the use of a uniform evidence protocol for the collection of physical evidence.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmates who are victims of sexual battery/assault shall be immediately referred to medical for evaluation and treatment of any life threatening injuries. The inmate will then be taken to the Emergency Room for further treatment and evidence collection. Follow up care will be provided, as necessary.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmates who are victims of sexual battery/assault shall be provided the rights of any victim and will be informed of their rights as a victim by the investigator assigned to the case. A victim's advocate (C.A.R.E.) will be made available to the inmate and as requested by the victim, the advocate shall accompany and support the victim through the forensic medical examination process and investigatory interviews, as well as provide emotional support, crisis intervention information, and referrals. Inmates will not be

charged for any forensic medical exam completed or for treatment services because of a sexual abuse.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states appropriate follow-up services, treatment plans and referrals for continued health care consistent with the community level of care will be provided to the victim following their transfer to or placement in other facilities or upon release from custody.

During the pre-on-site phase of the audit, the Auditor reviewed provided documentation, which included the SANEs/SAFEs evidence protocol for the State of Florida, *Sexual Assault Kit Form for Healthcare Providers*; contracts between CCSO and Prison Health Services, Inc. & Columbia Fawcett Memorial Hospital; and the CCSO and the Center for Abuse & Rape Emergencies, Inc. The contracts use clear and concise language, provides the agency's responsibilities, the contractor's responsibilities, and the reporting and documentation requirements for each. Additionally, the two contracts describe in detail, the expectations, and responsibilities of each contractor including performance measures, contract terms, and financial consequences if the required service is not met.

The Columbia Fawcett Memorial Hospital is a 253-bed, full-service acute care hospital with a 24-hour emergency care center serving the Charlotte County and surrounding areas. During the on-site phase of the audit, the Auditor conducted an interview with the SAFE Nurse employed by the Columbia Fawcett Memorial Hospital. The SANE Nurse explained to the Auditor the procedure of a forensic medical examination, to include following the use of the State of Florida, *Sexual Assault Kit Form for Healthcare Providers* that contains a twelve-page Sexual Assault Medical/Forensic Exam report that is completed for every forensic exam. The SAFE Nurse explained a sexual battery/assault victim (inmate) would be brought to the Columbia Fawcett Memorial Hospital where a forensic exam would be completed. The SANE Nurse confirmed that either she or other medical practitioners are available 24/7. The SAFE Nurse confirmed there were no forensic medical examinations completed for Charlotte County Sheriff's Office during the past 12 months.

The Center for Abuse & Rape Emergencies, Inc. is a non-profit behavioral health center that provides crisis intervention services, victim advocacy services for victims of sexual assault, and behavioral health services. The Center for Abuse & Rape Emergencies is the outside reporting entity for the inmates at Charlotte County Sheriff's Office to report sexual abuse and sexual harassment. Inmates may report to the Center for Abuse & Rape Emergencies by phone or in writing; the phone number and the mailing address is posted in every inmate dormitory next to the inmate phones and on every inmate smart tablet.

During the on-site phase of the audit, the Auditor conducted an interview with a certified rape crisis counselor and she confirmed the existing contract agreement with the facility. She

provided a very detailed description of the advocacy services provided to the inmates at Charlotte County Sheriff's Office to include the staffing of the rape crisis hotline 24 hours a day, 7 days a week. During the on-site phase of the audit, the Auditor conducted a tour of the facility and tested at least one phone in every housing area to ensure availability and functionality; all phones tested were confirmed to be working properly.

During the on-site phase of the audit, the Auditor interviewed a random sample of staff regarding his/her role as a First Responder to an allegation of sexual abuse. The staff members provided specific details of their responsibilities as a First Responder. These responsibilities include separating the victim and abuser, preserving, and protecting the crime scene, requesting that the alleged victim not take any actions that could destroy physical evidence, ensuring the alleged abuser does not take any actions, which would destroy physical evidence, and to immediately notify Medical and Mental Health. In addition, each staff member acknowledged the importance of the agency's response protocol to a sexual abuse allegation as well as his or her role as a First Responder.

Charlotte County Sheriff's Office reported no forensic medical exams were conducted during the past 12 months. During the on-site phase of the audit, the Auditor conducted separate interviews with the PREA Compliance Manager and the PREA Coordinator and both confirmed this information is correct. As previously stated above, the Auditor also confirmed this information during the interview with the certified SAFE Nurse.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office.

Upon review of the policies, contract documentation, review of the State of Florida, *Sexual Assault Kit Form for Healthcare Providers*, and observations made during the facility tour, and upon completion of interviews conducted during the on-site visit, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office General Order 11.21, <i>Sexual Violence/Battery</i></p> <p>Charlotte County Sheriff's Office Major Crimes Unit Investigator Training Curriculum &amp; Credentials</p> <p>Investigative Case files (7) – Sexual abuse and sexual harassment</p> <p>Charlotte County Sheriff's Office Agency Website</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Investigative Staff</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states that staff shall report any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment immediately to the supervisor and in accordance with policy and confidentiality requirements. Staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident, to include staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident, to include staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. When it is learned that an inmate is subject to a substantial risk of imminent sexual abuse, staff shall take immediate action for the protection for the inmate.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head regarding how the agency ensures that an administrative or criminal investigation is</p>

completed for allegations of sexual abuse or harassment. The Agency Head explained how the PREA Coordinator oversees and coordinates the process for all criminal and administrative investigations involving inmates. A criminal investigation is referred to the Major Crimes Unit and an administrative investigation is overseen by the PREA Coordinator. The PREA Coordinator will coordinate and monitor both the criminal and administrative investigative process to include final disposition and notification to the inmate. Any allegation involving a staff member is referred to the Internal Affairs Bureau for investigation. Any allegation of sexual harassment committed by an inmate is addressed as a disciplinary investigation at the facility level.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states it is the policy of the Charlotte County Sheriff's Office Detention Bureau to report all incidents of sexual battery/abuse immediately to Charlotte County Sheriff's Office Major Crimes Unit for investigation. The Charlotte County Sheriff's Office Major Crimes Unit has members trained to investigate allegations of sexual abuse/assault and to collect and process forensic evidence.

During the on-site phase of the audit, the Auditor conducted an interview with an investigator assigned to the Charlotte County Sheriff's Office Major Crimes Unit who confirmed the responsibilities of an investigator, reviewed the process of an investigation, and confirmed the use of a uniform evidence protocol for the collection of physical evidence. The investigator also confirmed agency policy requiring all allegations of inmate sexual abuse or sexual harassment must be referred to the Charlotte County Sheriff's Office Major Crimes Unit. The investigators assigned to the Major Crimes Unit have the legal authority as sworn law enforcement officers and have received proper training to conduct administrative and criminal investigations. The investigator confirmed attending and successfully completing the specialized training curriculum, *Specialized Training: Investigating Sexual Abuse in Correctional Settings* developed by The Moss Group, Inc.

Charlotte County Sheriff's Office publishes agency reporting methods for allegations of sexual abuse or sexual harassment for criminal investigation on the agency website <https://www.ccsso.org/Corrections/PREA.cfm>

According to the information provided in the PAQ (§115.22(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported sixteen allegations of sexual abuse and sexual harassment. During the on-site phase of the audit, the Auditor met with the PREA Coordinator and the staff member tasked with entering the information into the PAQ to clarify the discrepancy. The nine additional incidents were initially reported in the Jail Management System as a sexual abuse or sexual harassment incident; however, after reviewing the nine incidents it was determined these incidents did not meet the criteria of a sexual abuse or sexual harassment incident. Therefore, for the purpose of this report, the total number of allegations of sexual abuse and sexual harassment are seven.

The Auditor reviewed six administrative investigations and one criminal investigation. The Auditor reviewed each case thoroughly and systematically to ensure each case contained all of the correct procedures, completed documentation, and that all processes were completed as required, to include the report findings for the seven closed cases.

The Auditor found each case contained all the appropriate documentation, and determined that each incident was investigated promptly, thoroughly, and objectively by a qualified investigator from the Charlotte County Sheriff's Office Major Crimes Unit who has received training and education and has the authority to conduct such investigations. The Auditor noted each file contained documentation to include but not limited to the initial incident reports, supplemental reports, Medical and Mental Health forms, SANE/SAFE notification, evidence documentation (photos, videos, etc.), inmate classification screening, advocacy information, housing logs, confinement forms, witness statements, victim and alleged aggressor statements, final investigative report, notification of case disposition to inmate, and monitoring for retaliation forms.

Upon review of the policies, documentation, and case files previously discussed, and upon completion of the interviews conducted during the on-site visit, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.31	<b>Employee training</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Procedure P-11-032, <i>Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Staff PREA Training Curriculum</p> <p>Charlotte County Sheriff's Office Training Roster / Staff Signatures</p> <p>Interviews conducted with:</p> <p>Random sample of Staff</p> <p>On-site Review Observations:</p> <p>Personnel Training Records</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all staff shall be thoroughly trained and informed regarding the agency's zero-tolerance policy on sexual abuse and sexual harassment at least every two years. In addition to the general PREA training, investigators, medical health care practitioners, and mental health care practitioners shall complete specialized training. The Auditor reviewed the general PREA training curriculum, which included the following:</p> <ul style="list-style-type: none"> <li>• Agency's zero tolerance for sexual abuse and sexual harassment</li> <li>• How employees fulfill their responsibilities under agency sexual abuse and sexual harassment; prevention, detection, reporting, and response policies and procedures;</li> <li>• Inmates' rights to be free from sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment;</li> <li>• The right of inmates &amp; staff to be free from retaliation for reporting sexual abuse, sexual battery, staff sexual misconduct, or harassment;</li> <li>• Dynamics of sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment in confinement settings;</li> <li>• Common reactions of sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment in confinement settings;</li> <li>• How to detect and respond to signs of threatened &amp; actual sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment;</li> </ul>

- How to avoid inappropriate relationships with inmates and offenders;
- Communicating effectively & professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates;
- How to comply with relevant laws related to mandatory reporting of sexual abuse;

Charlotte County Sheriff's Office Procedure P-11-032, *Sexual Abuse/Battery Prevention & Intervention* states all staff members will receive initial training on PREA and their role as a member who receives information about inmate on inmate or staff on inmate sexual abuse/battery. Staff members will also receive annual refresher training to include inmate sexual abuse/assault awareness, prevention, response, and reporting procedures as well as confidentiality requirements.

During the pre-on-site phase of the audit, the Auditor reviewed training curriculum and documentation of staff signatures verifying training comprehension and attendance. The training curriculum outlined the staff member's responsibilities in preventing, detecting, and response to inmate sexual abuse and sexual harassment. The curriculum also provided staff with communicating effectively and professionally with inmates, understanding that inmates have the right to be free from sexual abuse and sexual harassment.

The Charlotte County Sheriff's Office PREA training curriculum provided to the Auditor, titled *PREA Basics* and *PREA Lesson Plan Transgender/Intersex Inmates*, includes an inmate's right to be free from sexual abuse and sexual harassment, including the right to dress, shower, and use toilet facilities out of view of staff of the opposite sex. The training also included the appropriate method to introduce/announce "opposite gender" correctional officers and supervision staff into an all-male or all-female housing unit and how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner consistent with security correctional environments. During the on-site phase of the audit, the Auditor reviewed additional training records that also verified receipt of the required PREA training and included certificates for specialized training.

During the on-site phase of the audit, the Auditor conducted random staff interviews. Each staff member interviewed articulated the agency's zero tolerance policy on sexual abuse and sexual harassment, their role and responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response, how to communicate effectively and professionally with inmates, and an inmates right to be free from sexual abuse and sexual harassment. All staff members acknowledged receiving the training every year during his/her In-service training.

Upon review of the policies and training documentation listed above and previously discussed, and after completion of interviews conducted during the on-site visit, in addition to the files reviewed during the on-site visit, Charlotte County Sheriff's Office demonstrated facility-wide

practices that are consistent with policy and the requirements that complies with the PREA standard.

115.32	<b>Volunteer and contractor training</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <hr/> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 400 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1243 553">Charlotte County Sheriff's Office Volunteer &amp; Contractor Training Curriculum</p> <p data-bbox="248 591 1398 627">Charlotte County Sheriff's Office Volunteer &amp; Contractor Training Roster with Signatures</p> <p data-bbox="248 887 596 922">Interviews conducted with:</p> <p data-bbox="248 958 968 994">Volunteer or Contractor who have contact with Inmates</p> <p data-bbox="248 1178 1481 1384">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the agency shall ensure that all contractors and volunteers who have contact with inmates are trained on their responsibilities in regards to this and related policies as it relates to the prevention, detection, and response to inmate sexual abuse allegations.</p> <p data-bbox="248 1498 1481 1789">During the pre-on-site phase, the Auditor reviewed training documentation to include training curriculum and attendance roster for contract and volunteer staff. Additional documentation included signatures from each contract staff and volunteer staff confirming understanding of policies and training received. The volunteer and contractor training was tailored based on the services they provide and the level of contact they have with inmates and included the agency's zero-tolerance policy regarding sexual abuse and sexual harassment along with how to report such incidents.</p> <p data-bbox="248 1904 1481 2022">During the on-site visit, the Auditor conducted interviews with volunteers and contract staff; each staff member confirmed and acknowledge understanding of the agency's zero tolerance policy and PREA standards and reporting responsibilities.</p>

Upon review of the policy and documentation and after completion of interviews conducted during the on-site visit, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.33	<b>Inmate education</b>
<b>Auditor Overall Determination:</b> Exceeds Standard	
<b>Auditor Discussion</b>	
<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office – Inmate PREA Comprehensive Education Video Report</p> <p>Charlotte County Sheriff's Office Inmate Handbook (multiple languages)</p> <p>PREA / Sexual Awareness CARE Information Handout (multiple languages)</p> <p>Interviews conducted with:</p> <p>PREA Compliance Manager</p> <p>Intake Staff</p> <p>Random Sample of Inmates</p> <p>Targeted Inmates (Limited English Proficient, Deaf, or Disabled)</p> <p>On-site Review Observations:</p> <p>Inmate files – Comprehensive PREA Education documentation</p> <p>PREA Informational Signage posted throughout facility</p> <p>PREA Informational video</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states during initial orientation to the facility, inmates shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. This will include information on prevention and intervention procedures.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all inmates will be presented with a Sexual Abuse/Battery pamphlet detailing how inmates can report incidents of sexual abuse privately, as well as the</p>	

process for gaining access to counseling and treatment programs offered prior to being assigned to a housing unit. Inmates will be required to sign that they have received and understand the Sexual Abuse/Battery pamphlet.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states within 30 days of intake, comprehensive education will be provided to inmates, either in person or through video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents and regarding agency policy on responding to such incidents.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmate education will be provided in formats accessible to all inmates, to include those inmates with recognized disabilities and Limited English Proficiency (LEP) shall be advised of the agency's zero tolerance policy on sexual abuse and sexual harassment. Inmates are assigned a smart tablet upon admission to the facility and each tablet contains PREA information in multiple languages with the options of large print or closed captioning for videos. The PREA video is played weekly in every inmate housing area.

During the on-site phase of the audit, the Auditor reviewed the comprehensive PREA educational video, provided in multiple languages and the Inmate PREA Comprehensive Education Video Report which documents the date and time an inmate acknowledged receiving and understanding the PREA comprehensive education video.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Compliance Manager and discussed the inmate comprehensive PREA orientation and documentation process. The PREA Compliance Manager provided specific details on the process of educating inmates including the initial orientation upon intake into the facility, the comprehensive orientation video, and the continued educational process by using PREA informational pamphlets, sexual assault prevention brochures, and the signage posted throughout the facility. The PREA Compliance Manager also referenced the inmate smart tablets as an additional method for inmates to obtain information as well as report any PREA related incidents.

During the on-site visit, the Auditor interviewed five targeted inmates with physical and cognitive disabilities, LEP, or hearing impaired. Each inmate acknowledged receiving PREA information during the intake / transfer process. Each inmate described receiving the comprehensive PREA orientation within the first day or two after arriving to the facility. Each inmate also informed the Auditor that all the information in the comprehensive PREA orientation is available for inmates on the smart tablets as well. Additionally, inmates acknowledged the information was provided to them in an accessible format specific to their individual needs.

During the on-site phase of the audit, the Auditor conducted a tour of the facility and observed PREA informational bulletins. These PREA bulletins are posted in multiple languages, located near the phones banks inside every housing area, as well as several informational bulletins were posted in common areas (educational and vocational buildings) throughout the compound. The bulletins display phone numbers and addresses for the victim advocate services and the Tips hotline and are displayed in multiple languages.

During the on-site phase of the audit, the Auditor inquired to Intake Staff how do they ensure all inmates, as have been educated on the agency's zero-tolerance policy on sexual abuse or sexual harassment. The Intake Staff informed the Auditor that even if an inmate has already received the orientation during a previous incarnation, all inmates entering the facility receive the PREA comprehensive orientation upon arrival to the facility. Additionally, the PREA orientation video is played every weekend in all housing areas.

During the on-site phase of the audit, the Auditor conducted twenty-one interviews with a random sample of inmates. All inmate interviews were conducted with the guidance of the National PREA Resource Center, PREA Compliance Audit Instrument - Interview Guide for Inmates. The Auditor requested an up-to-date inmate facility roster (in alphabetical order) from every housing dormitory and selected every tenth inmate from the inmate rosters provided.

Inmates from every housing unit and of various diversities were interviewed. All of the twenty-one inmates interviewed recalled receiving both the initial PREA orientation and the comprehensive (video) orientation. All twenty-one inmates interviewed recalled seeing the PREA orientation video multiple times as the facility replays the video every weekend in all housing areas. All inmates also acknowledged the zero tolerance policy on sexual abuse sexual harassment and the various ways to report such incidents.

Inmates also referred to utilizing the multiple PREA informational bulletins, pamphlets, and brochures, which are posted throughout the facility, as a source of information. All twenty-one inmates interviewed referred to utilizing the hotline, telling an officer, or using their assigned smart tablet as the most direct method to report a PREA related incident or inquire about PREA information. Twenty of the twenty-one inmates interviewed were aware of third party reporting and seventeen of the twenty-one inmates interviewed acknowledged the availability of submitting an anonymous PREA report.

Upon review of the policy and documentation listed above and previously discussed, and after completion of interviews conducted during the on-site visit, in addition to the observations made throughout the on-site tour, Charlotte County Sheriff's Office demonstrated facility-wide

practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

115.34	<b>Specialized training: Investigations</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Procedure General Order 11.21, <i>Sexual Violence/Battery</i></p> <p>Charlotte County Sheriff's Office Specialized Training Curriculum</p> <p>Charlotte County Sheriff's Office Investigator's Training Certificates</p> <p>Interviews conducted with:</p> <p>Investigative Staff</p> <p>On-site Review Observations:</p> <p>Training files</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states in addition to the general PREA training, investigators will receive training in conducting of such investigations in confinement settings. Specialized training shall include techniques for interviewing sexual abuse victims, appropriate application of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for prosecution referral.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Department shall maintain documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.</p> <p>During the pre-on-site audit phase, the Auditor reviewed training documentation, which included the specialized training curriculum from the National PREA Resource Center developed by The Moss Group, <i>Specialized Training: Investigating Sexual Abuse in</i></p>	

*Confinement Settings* and training certificates of completion verifying investigative staff that conduct sexual abuse investigations attended and completed the required specialized training.

During the on-site phase of the audit, the Auditor reviewed personnel files to verify training certificates were retained and on record. The Auditor also interviewed an investigator assigned to the Charlotte County Sheriff's Office Major Crimes Unit who confirmed his attendance and successful completion of the required specialized training curriculum from the National PREA Resource Center developed by The Moss Group, Inc., *Specialized Training: Investigating Sexual Abuse in Correctional Settings*.

The Investigator clearly articulated the comprehensive training he had received which included investigating sexual harassment allegations, investigating sexual abuse allegations, understanding the impact of victim trauma, techniques for interviewing sexual abuse victims, preservation of crime scene and evidence collection, proper use of Miranda and Garrity and the importance of each, and criteria required for administrative action and prosecution referrals.

Upon review of the policy and documentation listed above and previously discussed, and after completion of interviews conducted during the on-site visit, in addition to the observations made throughout the on-site visit, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Medical &amp; Mental Health Training Curriculum</p> <p>Charlotte County Sheriff's Office Training Certificates (Medical / Mental Health Staff)</p> <p>Interviews conducted with:</p> <p>Medical / Mental Health Staff</p> <p>On-site Review Observations:</p> <p>Medical Staff Training Records</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states Medical and Mental Health Care Practitioners who have contact with inmates will be notified of the agency's zero-tolerance policy. Medical and Mental Health Care Practitioners will receive training on their responsibilities in regards to the agency's sexual abuse and sexual harassment policy and procedures in regards to prevention, detection, reporting, and response. Documentation confirming understanding of the training will be maintained by Training.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all Medical and Mental Health Care Practitioners, who work regularly in Charlotte County Sheriff's Office facilities, will be trained in how to detect and assess signs of sexual abuse and sexual harassment. All Medical and Mental Health Care Practitioners will also be trained on how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how to report allegations of sexual abuse and sexual harassment.</p> <p>During the pre-on-site phase of the audit, the Auditor reviewed training records of all medical and mental health staff currently assigned to the facility; training records included the training curriculum and certificates of completion (with signatures). The training curriculum included the required elements of the agency's policy and of the PREA standard.</p>

During the on-site phase, the Auditor conducted interviews with three Medical & Mental Health staff members and confirmed receipt of specialized training on how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, and how to report allegations of sexual abuse and sexual harassment. Medical and Mental Health staff members also confirmed receiving the agency's general PREA training, which included the zero tolerance to sexual abuse and sexual harassment.

Upon review of the policy and documentation listed above and previously discussed, and after completion of interviews conducted, in addition to the observations made during the on-site visit file review, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Procedure P-10-007, <i>Classification Process</i></p> <p>Interviews conducted with:</p> <p>Staff Responsible for Risk Screening</p> <p>Random sample of Inmates</p> <p>PREA Coordinator</p> <p>On-site Review Observations:</p> <p>Inmate records of initial assessment &amp; reassessment</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all inmates will be assessed for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates during an intake screening conducted by Classification Staff within 72 hours of arrival to the facility.</p> <p>All inmates entering the facility will be screened by medical staff and classification. Inmates disclosing prior victimization whether is occurred in an institutional setting or in the community will be referred to Mental Health Services. Mental Health Services staff shall assess the inmate's need for treatment and discuss available options within 14 days of intake screening.</p> <p>Charlotte County Sheriff's Office Procedure P-10-007, <i>Classification Process</i> states a Classification Clerk will meet with each inmate in private to conduct a classification interview within 72 hours of arrival at the facility. Information obtained from the inmate will be documented in the Jail Management System (JMS). Interview information and the following criteria is reviewed to determine the inmate classification and custody level. Inmates will not be</p>

disciplined or locked down for refusing or not completely disclosing information related to the following questions:

- Whether the inmate has mental, physical, or developmental disability
- The age of the inmate
- The physical build of the inmate
- Previous incarceration
- Whether the inmate's criminal history is exclusively nonviolent
- Prior acts of sexual abuse; prior convictions for sex offenses and/or violent offenses
- History of prior institutional violence or sexual abuse
- Whether an inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming
- The inmates own perception of vulnerability
- Whether the inmate is detained solely for civil immigration purposes

Charlotte County Sheriff's Office Procedure P-10-007, *Classification Process* states a re-assessment of an inmate's risk of victimization or abusiveness will be conducted within 30 days of the inmate's arrival to the facility if additional, relevant information is received by the facility since the intake screening. Additionally, an inmate's risk level shall be reassessed when warranted due to a referral, request, and incident of sexual abuse or information received that has a bearing on the inmate's risk of sexual victimization or abusiveness.

Charlotte County Sheriff's Office Procedure P-10-007, *Classification Process* states inmates determined to be at risk to commit sexual assault and inmates determined to be at risk of being victimized will be housed accordingly.

During the pre-on-site phase of the audit, the Auditor reviewed four *PREA Risk Assessments* and during the on-site phase of the audit, the Auditor reviewed an additional twelve *PREA Risk Assessments* completed during this audit period. All forms were filled out completely and in accordance to the agency policy.

During the on-site phase of the audit, the Auditor conducted interviews with three Classification Officers regarding the responsibility to conduct screenings for risk of victimization and abusiveness. Each Classification Officer provided the Auditor with a complete overview of the inmate classification process and the inmate risk screening process to include how all inmates are screened within 72 hours (or less) of their arrival to the facility.

The Auditor inquired to each Classification Officer what actions are taken against inmates who refuse to cooperate or answer the questions in the risk screening process; each Classification Officer responded that inmates are not required to provide answers, if this occurs, a follow-up interview with the inmate would be conducted. All three Classification Officers confirmed that

inmates are not disciplined for refusing to cooperate or answer the questions in the risk screening process.

All three Classification Officers confirmed all interviews are conducted privately and the interviews include the classification and risk assessment process, program opportunities, qualifications for job assignments, and educational opportunities.

During the on-site phase of the audit, the Auditor reviewed thirteen inmate records. These records were selected based upon either inmates who reported sexual abuse or sexual harassment allegations, inmates who reported sexual victimization during intake, length at facility, and inmates that disclosed sexual orientation as gay or bisexual. Each file contained the initial risk screening form as well as the 30-day reassessment form; all were filled out completely and in accordance to the agency's policy.

During the on-site phase of the audit, the facility provided the Auditor with documentation showing inmates who disclosed prior sexual victimization during the intake process were either released from custody of the Charlotte County Sheriff's Office or were transferred to another correctional facility and unavailable for an interview.

During the on-site phase of the audit, the Auditor conducted twenty-one interviews with a random sample of inmates. All inmate interviews were conducted with the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Inmates*. The Auditor requested an up-to-date inmate roster (in alphabetical order) from every housing unit and selected every tenth inmate from the inmate rosters provided.

Inmates from every housing unit and of various diversities were interviewed. Four of the twenty-one inmates interviewed entered the facility fourteen months or longer, therefore this particular interview question was not posed to them. Of the remaining seventeen inmates interviewed, all seventeen inmates recalled the initial risk assessment interview as well as the second risk assessment interview occurring with a member of the Classifications Team and within a month from the initial assessment.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states the agency shall use information from the risk assessment to inform housing, bed, work, education, and program assignment with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The agency shall implement appropriate controls on the dissemination within the facility of responses to the questions asked pursuant to risk assessment to ensure privacy of sensitive information that may be used for exploitation by staff or other inmates.

During the on-site phase of the audit, the Auditor inquired to the three Classification Officers interviewed, how the Charlotte County Sheriff's Office protects such sensitive information. The Classification Officers each stated the access to such information is strictly limited to Classification Staff, Medical, and Mental Health.

During the on-site phase of the audit, the Auditor inquired to the PREA Coordinator how the facility protects sensitive information, in particular an inmate's risk assessment. The PREA Coordinator explained how the risk assessments are maintained securely and only Classification Staff, Medical, and Mental Health have access to the risk assessments.

Upon review of the policies, on-site file review, and upon completion of the interviews with inmates and specialized staff, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.42	<b>Use of screening information</b>
	<p data-bbox="248 168 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1246 553">Charlotte County Sheriff's Office Procedure P-10-007, <i>Classification Process</i></p> <p data-bbox="248 593 1358 629">Charlotte County Sheriff's Office Procedure P-08-042, <i>Transgender/Intersex Inmates</i></p> <p data-bbox="248 813 596 848">Interviews conducted with:</p> <p data-bbox="248 889 727 925">Staff Responsible for Risk Screening</p> <p data-bbox="248 965 619 1001">PREA Compliance Manager</p> <p data-bbox="248 1041 600 1077">Non-heterosexual Inmates</p> <p data-bbox="248 1180 1481 1471">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the agency shall use information from the risk assessment to inform housing, bed, work, education, and program assignment with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The agency shall implement appropriate controls on the dissemination within the facility of responses to the questions asked pursuant to risk assessment to ensure privacy of sensitive information that may be used for exploitation by staff or other inmates.</p> <p data-bbox="248 1583 1465 1919">Charlotte County Sheriff's Office Procedure P-08-042, <i>Transgender/Intersex Inmates</i> states housing for transgender and intersex inmates will be determined on a case-by-case basis. The inmate will be assigned a housing assignment based on their safety/security needs, housing availability, gender identity, and genitalia. Classification will interview the inmate and ask their opinion on vulnerability in general population male or female housing units. This information, along with any previous housing assignments, will be taken into consideration by Classification. The Operations Commander or Administrative Commander, the Medical Department will review the proposed housing assignment before it is implemented.</p> <p data-bbox="248 2031 1481 2143">Charlotte County Sheriff's Office Procedure P-08-042, <i>Transgender/Intersex Inmates</i> states transgender and intersex inmates will be reassessed at least twice each year to review any threats to safety experienced by the inmate. An interview will be conducted as well as a review</p>

of their housing, program and work assignments to determine if there are any changes or threats to the inmate's safety.

During the on-site phase of the audit, the Auditor conducted interviews with three Classification Officers regarding the responsibility to conduct screenings for risk of victimization and abusiveness. Each Classification Officer provided the Auditor with a complete overview of the inmate classification process and the inmate risk screening process to include how all inmates are screened within 72 hours (or less) of their arrival to the facility.

Each Classification Officer explained how the facility uses the information obtained from the risk screening assessment interviews to determine housing assignment for each inmate, which is done strictly on a case-by-case basis. She further explained a transgender or intersex inmate's own views on safety is given consideration during this process and if placed in protective custody, such placement is done at the request of the inmate or solely based on the inmate's classification level.

During the on-site visit phase of the audit, the Auditor conducted an interview with the PREA Compliance Manager on how the facility uses information obtained from the risk screening assessment interview to keep inmates from being sexually victimized or being sexually abusive. The PREA Compliance Manager described the risk screening process and explained how depending upon the responses given by the inmate is used to assist in the initial classification and with determining the risk level of vulnerability. Inmates perceived to be vulnerable or predatory will be housed and given work / program assignments consistent with custody level and medical status. Inmates at a risk of high victimization are involuntarily segregated, only if an assessment of all other available alternatives has been made and it is determined that no other alternative means of separation from likely abusers exist.

The Auditor also inquired to the PREA Compliance Manager how the facility determine housing and program assignments for transgender or intersex inmates. The PREA Compliance Manager explained that housing for a transgender or intersex inmate is determined on a case-by-case basis. The inmate's safety as well as the safety and the security of the institutional compound will be taken into consideration when making the housing determination. The PREA Compliance Manager also confirmed that transgender or intersex inmates are given the opportunity to shower separately from other inmates.

During the on-site phase of the audit, the Auditor requested an up-to-date inmate roster for non-heterosexual inmates to conducted targeted inmate interviews. All inmate interviews were conducted with the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Inmates*.

The Auditor conducted six interviews with inmates who identify as non-heterosexual inmates. Each inmate was questioned whether they were placed in a housing area only for non-heterosexual inmates. Each inmate acknowledged being housed in a general population housing area for all inmates of the same level of classification, which are based on each individual inmate's criminal history.

During the on-site phase of the audit, the facility provided the Auditor with documentation showing two transgender inmates previously in custody, were either released from custody of the Charlotte County Sheriff's Office or were transferred to another correctional facility and unavailable for an interview.

Upon review of the policies and upon completion of the interviews with targeted inmates and specialized staff, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

115.43	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Facility Warden</p> <p>Staff who supervise Inmates in Segregated Housing</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates determined to be at risk to commit sexual assault and inmates determined to be at risk of being victimized will be housed accordingly and shall not be placed in involuntarily segregated housing unless an assessment of all alternatives have been made. If an assessment cannot be completed immediately, the facility may hold the inmate in involuntarily segregated housing for less than 24 hours while completing assessment.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden regarding inmates at high risk of victimization. The Facility Warden explained the PREA Risk Assessment interview assists Classification Staff in determining whether an inmate may be at risk for sexual victimization or at risk for abusiveness. The Facility Warden explained how the interview process, as well as an inmate's own perception of vulnerability, provides Classification Staff with the proper criteria in determining appropriate and safe housing assignments for inmates identified as being at risk. Inmates who are placed in segregated housing, either voluntarily or involuntarily, are placed in segregated housing on a temporary basis, typically less than 24 hours or as soon as an alternative means of housing can be arranged.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with a Facility Staff Member who supervises inmates in segregated housing. The Auditor inquired to the Facility Staff Member if an inmate who is placed in segregated housing for protection from sexual abuse or after having alleged sexual abuse, what restrictions are placed on the inmate. The Facility Staff Member clarified to the Auditor that the facility does not place inmates who have been a victim of sexual abuse in segregated housing unless the inmate (victim) requests</p>

Protective Custody. The Facility Staff Member explained inmates who are placed in Protective Custody (segregated housing for protection) do not have restrictions and retain the same privileges as inmates in general population housing, to include participating in programs and education opportunities. The Facility Staff Member explained if an inmate has restrictions placed on him it would be a result of their behavior or actions, and such action (being placed on restrictions) would require documentation explaining what has been restricted, duration of restriction, and reasons for initiating the restriction.

During the 12 months prior to the audit, the facility reported in the PAQ there were no inmates at risk of sexual victimization being assigned to involuntary segregated housing. Therefore, no interviews conducted with inmates at risk of sexual victimization being assigned to involuntary segregated housing. During the on-site phase of the audit, the Auditor interviewed three Classification Officers and the PREA Compliance Manager and each confirmed the information previously provided by the facility in the PAQ was correct.

Upon review of the policy and documentation provided and upon completion of the interviews with staff, the Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.51	<b>Inmate reporting</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Memorandum of Understanding with Center for Abuse &amp; Rape Emergencies, Inc. (C.A.R.E.)</p> <p>Charlotte County Sheriff's Office Inmate Handbook (English/Spanish)</p> <p>Charlotte County Sheriff's Office Inmate Sexual Abuse/Battery Prevention &amp; Intervention Guide</p> <p>PREA Education / C.A.R.E. Information Brochure (English/Spanish)</p> <p>Interviews conducted with:</p> <p>PREA Compliance Manager</p> <p>Random sample of Staff</p> <p>Random sample of Inmates</p> <p>On-site Review Observations:</p> <p>PREA informational signage</p> <p>C.A.R.E. Support Services Hotline</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states during initial orientation to the facility, inmates shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. This will include information on prevention and intervention procedures.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states an inmate may report sexual abuse/battery and sexual harassment verbally, in writing, and anonymously. Any verbal reports will be documented immediately by a staff member. An inmate may also report privately by notifying the housing</p>

officer, chaplain, programs officer or any other staff member. Such reporting will not be referred to a staff member, if the member is subject of the complaint. Staff members have been instructed to keep all reported information confidential, and it will only be discussed with appropriate officials. When a staff member is advised by an inmate that they have been a victim of a sexual abuse/battery or sexual harassment, the staff should take all statements seriously.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmates may also contact the Center for Abuse and Rape Emergencies, Inc. (CARE) to report abuse or harassment toll free at 941.627.6000. Inmate reports of sexual abuse or sexual harassment will be immediately forwarded to agency officials and allowing the inmate to remain anonymous upon request. Inmates detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states reports of sexual abuse/battery may also be reported through a third party by means of the Charlotte County Sheriff's Office website, Online Crime Tips. The form can be submitted anonymously. The Online Crime Tips is also the private reporting method for Charlotte County Sheriff's Office staff members.

During the pre-on-site phase of the audit, the Auditor reviewed the contract between the Charlotte County Sheriff's Office and the Center for Abuse & Rape Emergencies, Inc. (C.A.R.E.)

The Center for Abuse & Rape Emergencies, Inc. (C.A.R.E.) is a non-profit behavioral health center that provides crisis intervention services, victim advocacy services for victims of sexual abuse, and behavioral health services. The Center for Abuse & Rape Emergencies is the outside reporting entity for the inmates at Charlotte County Sheriff's Detention facility to report sexual abuse and sexual harassment. Inmates may report to the Center for Abuse & Rape Emergencies by phone or in writing; the phone number and the mailing address is posted in every inmate housing area next to the inmate phones and on every inmate smart tablet.

During the on-site phase of the audit, the Auditor conducted an interview with a victim advocate from the Center for Abuse & Rape Emergencies, Inc. The victim advocate confirmed C.A.R.E. provides the services, as stated in the contract, to the inmates incarcerated at Charlotte County Sheriff's Detention facility.

During the on-site phase of the audit, the Auditor conducted a facility tour. During the tour of the facility, the Auditor conducted informal interviews with inmates in the housing areas;

various work assignments, and while touring medical, food service, and intake and release. Throughout the facility tour, the Auditor conducted multiple test calls using the hotline available for inmates to report. The hotline is a secured, confidential line and has a designated number, which is posted near the phones in all housing areas. All phones tested during the on-site phase of the audit were found to be in working order.

Also throughout the facility tour, the Auditor observed PREA informational signage posted in all housing areas, inmate common areas, hallways, medical areas, inmate program areas, intake and release, and in inmate work areas (laundry, food service, etc.). The PREA informational signage was posted in multiple languages.

During the on-site phase of the audit, the Auditor conducted twenty-one interviews with a random sample of inmates. All inmate interviews were conducted with the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Inmates*. The Auditor requested an up-to-date inmate facility roster (in alphabetical order) from every housing area and selected every tenth inmate from the inmate rosters provided.

Inmates from every housing dormitory and of various diversities were interviewed. Inmates were asked how they would report an incident of sexual abuse or sexual harassment if it happened to them or another inmate. All twenty-one inmates interviewed indicated using either the PREA hotline, inmate smart tablet, or telling a staff member as their preferred method of reporting. All of the inmates listed more than two methods of reporting when the Auditor posed the initial question, confirming inmates are educated in the multiple reporting avenues available. Inmates were also questioned if they could submit a report anonymously or have a third party report the incident. Twenty of the twenty-one inmates interviewed acknowledge "yes" to having another inmate report for them or a family member (third party reporting) and sixteen of the twenty-one inmates interviewed were aware they could file a report without providing a name (anonymously).

During the on-site phase of the audit, the Auditor-conducted interviews with a random sample of staff and asked each staff member how an inmate can privately report sexual abuse and sexual harassment or retaliation by other inmates or staff for previously reporting sexual abuse and sexual harassment.

Each staff member interviewed was able to articulate the various methods an inmate may privately report an allegation of sexual abuse or sexual harassment (CARE hotline, third party reporting via agency website, *Online Crime Tips*). Staff members also explained that reports concerning sexual abuse or sexual harassment, whether reported verbally or in writing, are considered confidential and must be documented immediately.

The Auditor inquired to each staff member how he/she would report an allegation of sexual abuse or sexual harassment of inmates privately. Staff responses were evenly divided to either submitting a form on the agency's website, *Online Crime Tips* or tell his/her immediate supervisor. Staff members expressed confidence in reporting either to the website or privately to his/her supervisor and no one reported fear of retaliation.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Compliance Manager to verify reporting methods for sexual abuse or sexual harassment allegations that are available for inmates and staff. The PREA Compliance Manager confirmed the multiple methods of reporting available for inmates and staff, these reports can be made either verbally, in writing, by a third party and may be done so in private or anonymously and all reports, no matter the method used to report, are confidential and handled promptly and professionally. The PREA Compliance Manager confirmed that the Center for Abuse & Rape Emergencies, Inc. is the designated outside entity for inmate reporting.

Upon review of the policies, contracts, inmate handbook, and PREA informational brochures and signs and upon completion of interviews conducted, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

115.52	<b>Exhaustion of administrative remedies</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1310 553">Charlotte County Sheriff's Office Procedure P-11-045, <i>Inmate Grievance Process</i></p> <p data-bbox="248 736 596 772">Interviews conducted with:</p> <p data-bbox="248 813 491 848">PREA Coordinator</p> <p data-bbox="248 1032 1469 1364">Charlotte County Sheriff's Office Procedure P-11-045, <i>Inmate Grievance Process</i> states while a grievance is not the primary method for inmates to report sexual abuse, an inmate who alleges sexual abuse may submit a grievance to the Housing Deputy. If the staff member is the subject of the complaint, the inmate may submit the grievance to another staff member to pass on to the housing supervisor or the inmate may submit the grievance to the housing supervisor upon request. Grievances will not be referred to the staff member who is the subject of the complaint. The grievance will then be forwarded with supporting documentation to the Assistant Detention Commander who will take appropriate action.</p> <p data-bbox="248 1480 1461 1682">Charlotte County Sheriff's Office Procedure P-11-045, <i>Inmate Grievance Process</i> states third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and are permitted to file such requests on behalf of inmates.</p> <p data-bbox="248 1798 1477 2000">Charlotte County Sheriff's Office Procedure P-11-045, <i>Inmate Grievance Process</i> states if a third party files a grievance on behalf of an inmate, the victim must agree to have the request filed on his or her behalf, and the alleged victim must personally pursue any subsequent steps in the grievance process. If the inmate declines to have the request processed on his or her behalf, the inmate's decision will be documented.</p> <p data-bbox="248 2116 1453 2152">Charlotte County Sheriff's Office Procedure P-11-045, <i>Inmate Grievance Process</i> there is no</p>

time limit for an inmate submitting a grievance alleging sexual abuse or sexual harassment and the agency shall issue a final agency decision on the merits of any portion of the grievance within 90 days of the initial date of filing unless an emergency grievance is filed. In the event of an emergency grievance, the agency will provide an initial response within 48 hours and issue a final decision within five calendar days. The initial response and final agency decision will document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Charlotte County Sheriff's Office Procedure P-11-045, *Inmate Grievance Process* states when it is determined that an inmate has filed a PREA report in bad faith, i.e., knowingly filed a false report, that inmate shall be subject to discipline.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody.

Upon review of policies and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.53	<b>Inmate access to outside confidential support services</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1449 553">Memorandum of Understanding with Center for Abuse &amp; Rape Emergencies, Inc. (C.A.R.E.)</p> <p data-bbox="248 593 1485 629">Charlotte County Sheriff's Office Inmate Sexual Abuse/Battery Prevention &amp; Intervention Guide</p> <p data-bbox="248 669 1123 705">PREA Education / C.A.R.E. Information Brochure (English/Spanish)</p> <p data-bbox="248 887 596 922">Interviews conducted with:</p> <p data-bbox="248 963 612 999">Random sample of Inmates</p> <p data-bbox="248 1039 751 1075">Inmates who reported a Sexual Abuse</p> <p data-bbox="248 1256 639 1292">On-site Review Observations:</p> <p data-bbox="248 1332 617 1368">PREA informational signage</p> <p data-bbox="248 1408 722 1444">C.A.R.E. Support Services Brochure</p> <p data-bbox="248 1547 1485 1709">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Charlotte County Sheriff's Office, Detention Bureau has contracted with Charlotte County Mental Health, to provide mental health services to the entire inmate population, as well as inmates that have been sexually abused.</p> <p data-bbox="248 1821 1465 2072">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Center for Abuse and Rape Emergencies, Inc., has entered into a collaborative agreement with the Charlotte County Sheriff's Office to provide services to inmates sexually abused. Mailing addresses and toll free hotline numbers are provided through the Sexual Abuse/Battery Prevention and Intervention Guide or through the housing officer.</p>

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states communication with CARE will be completed in as confidential a manner as possible. Prior to access, inmates will be made aware of the extent to which communication will be monitored and to the extent which reports of abuse will be forwarded for investigation in accordance with mandatory reporting laws.

During the pre-on-site phase of the audit, the Auditor reviewed the contract between the Charlotte County Sheriff's Office and the Center for Abuse & Rape Emergencies, Inc. (C.A.R.E.)

During the on-site phase of the audit, the Auditor conducted an interview with a victim advocate from the Center for Abuse & Rape Emergencies, Inc. The victim advocate confirmed C.A.R.E. provides the services, as stated in the contract, to the inmates incarcerated at Charlotte County Sheriff's Detention facility.

The Center for Abuse & Rape Emergencies, Inc. (C.A.R.E.) is a non-profit behavioral health center that provides crisis intervention services, victim advocacy services for victims of sexual abuse, and behavioral health services. The Center for Abuse & Rape Emergencies is the outside reporting entity for the inmates at Charlotte County Sheriff's Detention facility to report sexual abuse and sexual harassment. Inmates can report to C.A.R.E. either by phone or in writing; the phone number and the mailing address is posted in every inmate housing area next to the inmate phones and is posted on every inmate smart tablet. C.A.R.E. also has a dedicated toll-free hotline for services and support, and is designated as the outside reporting hotline for inmates.

During the on-site phase of the audit, the Auditor conducted a facility tour. Throughout the tour, the Auditor noted PREA informational posters and Sexual Abuse Awareness Brochures displayed in all housing areas, inmate common areas, hallways, medical areas, inmate program areas, intake and release, and in inmate work areas (laundry, food service, etc.). The PREA informational signage was posted in multiple languages.

During the on-site phase of the audit, the Auditor conducted twenty-one interviews with a random sample of inmates. All inmate interviews were conducted with the guidance of the National PREA Resource Center, PREA Compliance Audit Instrument - Interview Guide for Inmates. The Auditor requested an up-to-date inmate facility roster (in alphabetical order) from every housing dormitory and selected every tenth inmate from the inmate rosters provided.

Inmates from every housing area and of various diversities were interviewed. Inmates were

asked if needed, are there services available, outside of the facility for dealing with sexual abuse. Twenty of the twenty-one inmates interviewed stated services are available from the CARE Center; all twenty inmates referred to obtaining the information from their inmate smart tablets. All thirty-two inmates interviewed acknowledged being provided mailing address and telephone numbers to victim advocacy services and that such call is toll-free.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office and unavailable for an interview.

Upon review of the policies and upon completion of the interviews with inmates and staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.54	<b>Third-party reporting</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 411 360">Documents:</p> <p data-bbox="252 400 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 517 1485 551">Charlotte County Sheriff's Office Inmate Sexual Abuse/Battery Prevention &amp; Intervention Guide</p> <p data-bbox="252 591 1270 667">Charlotte County Sheriff's Office Website <a href="https://www.ccsso.org/Corrections/PR_EA.cfm">https://www.ccsso.org/Corrections/PR EA.cfm</a></p> <p data-bbox="252 707 852 741">PREA Informational Poster (English / Spanish)</p> <p data-bbox="252 853 596 887">Interviews conducted with:</p> <p data-bbox="252 927 612 960">Random sample of Inmates</p> <p data-bbox="252 1072 639 1106">On-site Review Observations:</p> <p data-bbox="252 1146 616 1180">PREA informational signage</p> <p data-bbox="252 1292 1465 1715">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states an inmate may report sexual abuse/battery and sexual harassment verbally, in writing, and anonymously. Any verbal reports will be documented immediately by a staff member. An inmate may also report privately by notifying the housing officer, chaplain, programs officer or any other staff member. Such reporting will not be referred to a staff member, if the member is subject of the complaint. Staff members have been instructed to keep all reported information confidential, and it will only be discussed with appropriate officials. When a staff member is advised by an inmate that they have been a victim of a sexual abuse/battery or sexual harassment, the staff should take all statements seriously.</p> <p data-bbox="252 1827 1481 2027">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states reports of sexual abuse/battery may also be reported through a third party by means of the Charlotte County Sheriff's Office website, Online Crime Tips. The form can be submitted anonymously. The Online Crime Tips is also the private reporting method for Charlotte County Sheriff's Office staff members.</p>

During the on-site phase of the audit, the Auditor conducted twenty-one interviews with a random sample of inmates. All inmate interviews were conducted with the guidance of the National PREA Resource Center, PREA Compliance Audit Instrument - Interview Guide for Inmates. The Auditor requested an up-to-date inmate facility roster (in alphabetical order) from every housing dormitory and selected every tenth inmate from the inmate rosters provided.

Inmate from every housing dormitory and of various diversities were interviewed. Every inmate interviewed recalled receiving both the initial PREA orientation and the comprehensive (video) orientation. All inmates also acknowledged the zero tolerance policy on sexual abuse and sexual harassment and the various ways to report such incidents.

When questioned about third party reporting, twenty of the twenty-one inmates interviewed acknowledged how to submit a third party report (ask a family member or friend to submit a report or call the CARE hotline). In addition, several of the inmates referred to the PREA information posted on every inmate smart tablet, which contains information about the CARE Center, and the directions on how to submit a third party report.

During the pre-on-site phase of the audit, the Auditor visited the agency's website and confirmed the availability for the public to submit a report of sexual abuse or sexual harassment on behalf of an inmate. The report may also be submitted anonymously.

Upon review of the policies and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.61	<b>Staff and agency reporting duties</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 411 360">Documents:</p> <p data-bbox="252 400 1350 479">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 591 596 624">Interviews conducted with:</p> <p data-bbox="252 665 568 698">Random sample of Staff</p> <p data-bbox="252 739 628 772">Medical / Mental Health Staff</p> <p data-bbox="252 813 453 846">Facility Warden</p> <p data-bbox="252 958 1469 1160">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility. Retaliation against inmates or staff who reported such an incident to include any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p data-bbox="252 1272 1477 1473">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates, and staff have a right to be free from retaliation for reporting sexual abuse and sexual harassment. When it is learned that an inmate is subject to a substantial risk of imminent sexual abuse, staff shall take immediate action for the protection for the inmate.</p> <p data-bbox="252 1664 1409 1787">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states staff members have been instructed to keep all reported information confidential, and it will only be discussed with appropriate officials.</p> <p data-bbox="252 1899 1449 2101">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Charlotte County Sheriff's Office is the law enforcement agency who has the legal authority and responsibility for investigating allegations of sexual abuse/battery. Reports of incidents of sexual abuse/battery shall be immediately reported to the Major Crimes Unit for investigation.</p>

During the on-site phase of the audit, the Auditor conducted interviews with a random sample of staff members. Each staff member interviewed articulated the agency's zero tolerance policy on sexual abuse and sexual harassment, their role and responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response, how to communicate effectively and professionally with inmates, and an inmates right to be free from sexual abuse and sexual harassment. Staff members also acknowledged that reports concerning sexual abuse or sexual harassment, whether reported verbally or in writing, are considered confidential and must be documented immediately.

During the on-site phase of the audit, the Auditor conducted interviews with three Medical and Mental Health Staff regarding responsibilities to disclose to inmates the confidentiality limitations and reporting incidents of sexual abuse or sexual harassment. Each Medical and Mental Health Staff member articulated in detail step-by-step process when reporting incidents of sexual abuse or sexual harassment as well as expressed the requirement to report such incidents immediately. Each Medical and Mental Health Staff member acknowledged disclosing the confidentiality limitation prior to the initiation of services with any inmate. The Auditor inquired if any inmates had reported an incident of sexual abuse or harassment during the past 12 months to them and all indicated they had not received such reports.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and inquired how Charlotte County Sheriff's Office responds when an allegation of sexual abuse or sexual harassment is made by someone under the age of 18 or someone who is considered vulnerable adult under state law. The Facility Warden explained that if the victim were a juvenile or a vulnerable adult, the Major Crimes Unit Investigator in charge of the investigation would contact the Children and Family Services and/or the Child Protection Team if the circumstances warrant it or if required by Florida State Statutes.

The Auditor inquired to the Facility Warden are allegations of sexual abuse and sexual harassment, to include third party and anonymous sources, reported to designated facility investigators. The Facility Warden indicated all allegations of sexual abuse and sexual harassment, no matter the origin of reporting, are reported directly to the Charlotte County Sheriff's Office Major Crimes Unit.

Upon review of the policies and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Facility Warden</p> <p>Random sample of Staff</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility. Retaliation against inmates or staff who reported such an incident to include any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates, and staff have a right to be free from retaliation for reporting sexual abuse and sexual harassment. When it is learned that an inmate is subject to a substantial risk of imminent sexual abuse, staff shall take immediate action for the protection for the inmate.</p> <p>During the on-site phase of the audit, the Auditor conducted interviews with a random sample of staff and inquired about his/her actions if they received information that an inmate was in imminent risk of sexual abuse. Each staff member articulated the agency's response protocol to receiving such information and all staff members interviewed confirmed the first priority is ensuring the safety of the inmate. Staff indicated that once the inmate who was at risk is secured, they would immediately notify their Supervisor and investigate the incident.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and inquired as to what action is taken upon learning an inmate is subject to a substantial risk of imminent sexual abuse. The Facility Warden informed the Auditor that once</p>

a staff member receives information that an inmate may be at risk for sexual abuse or sexual harassment, that inmate is immediately removed from the area. The inmate victim's housing preference is considered, however the decision on the inmate's ultimate placement is driven by the need for protection from possible abuse and/or retaliation.

During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head regarding what action is taken upon learning an inmate is subject to a substantial risk of imminent sexual abuse. The Agency Head stated if an inmate is at risk of imminent sexual abuse the first thing staff will be responsible for removing the victim from the risk/threat. Staff would notify his/her Supervisor and an investigation into the threat would be completed. The potential victim will be given the opportunity to speak with a staff member regarding the situation as well as Medical and Mental Health. If necessary, a housing review by Classification Officers would be completed. Additionally, the inmate may request placement in Protective Custody (PC).

Upon review of the policy and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.63	<b>Reporting to other confinement facilities</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 665 596 701">Interviews conducted with:</p> <p data-bbox="248 741 427 777">Agency Head</p> <p data-bbox="248 817 453 853">Facility Warden</p> <p data-bbox="248 1032 1485 1323">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states upon receiving an allegation that an inmate was sexually abused while confined at another facility, the information will be placed on a confidential incident report and provided to the PREA Coordinator. The PREA Coordinator will contact the appropriate facility where the alleged abuse occurred and make formal notification. Notification to facility must be made within 72 hours from receiving the allegation. The allegation of abuse will be documented and investigated in accordance with the DOJ standards.</p> <p data-bbox="248 1507 1481 1758">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states upon receiving notification from another facility that an inmate reported being sexually abused while confined at Charlotte County Sheriff's Detention facility, the information will be placed on a confidential incident report and provided to the PREA Coordinator. The PREA Coordinator will ensure the allegation of abuse will be documented and investigated in accordance with the DOJ standards.</p> <p data-bbox="248 1870 1469 2031">In the twelve months prior to the audit, Charlotte County Sheriff's Office reported receiving no allegations of sexual abuse from another facility and no allegations were received from Charlotte County Sheriff's Office inmate alleging sexual abuse while confined at another facility.</p>

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and asked what the process is when your facility receives an allegation from another facility or agency that an inmate reported being a victim of sexual abuse or sexual harassment while housed at the Charlotte County Sheriff's Detention facility. The Facility Warden explained that an investigation into the allegation would be completed by either the PREA Coordinator or an investigator from the Major Crimes Unit within 72 hours of receipt of the allegation.

During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head and inquired if another agency or facility refers allegations of sexual abuse or sexual harassment that occurred at your facility, is there a designated point of contact. The Agency Head explained that an investigation into the allegation would be completed by either the PREA Coordinator or an investigator from the Major Crimes Unit within 72 hours of receipt of the allegation.

Upon review of the policy and upon completion of the interviews conducted, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Security Staff / Non-Security Staff First Responders</p> <p>Random sample of Staff</p> <p>PREA Coordinator</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all agency members who may have contact with inmates will receive training on the agency's zero-tolerance policy on sexual abuse and sexual harassment. Detention Staff shall be trained in recognizing the physical, behavioral, and emotional signs of sexual abuse. Staff will be trained in understanding the identification and referral process when alleged sexual batteries occur, as well as a basic understanding of prevention and response techniques.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states upon learning of an inmate sexual abuse or sexual harassment, the first staff member to respond to the report shall be required to:</p> <ul style="list-style-type: none"> <li>● Provide immediate protection for the inmate from the alleged assailant;</li> <li>● Preserve and protect any potential crime scene until appropriate steps can be taken to collect evidence;</li> <li>● Request that the alleged victim not take any actions that could destroy physical evidence, including but not limited to, washing, showering, eating, drinking, using the restroom, or changing clothes;</li> <li>● Request that the alleged abuser not take any actions that could destroy physical evidence, including but not limited to, washing, showering, eating, drinking, using the restroom, or changing clothes;</li> <li>● Notify immediate Supervisor of the situation;</li> <li>● Immediately refer the inmate to medical for evaluation and treatment;</li> <li>● If the first responder is not a security staff member, request that the alleged victim not</li> </ul>

take any action that could destroy physical evidence, and then notify security staff.

During the on-site phase of the audit, the Auditor conducted random Staff interviews and two targeted interviews (Security Staff who act as First Responders) regarding his/her role as a First Responder to an allegation of sexual abuse. The Staff Members provided specific details of their responsibilities as a First Responder. These responsibilities include separating the victim and abuser, preserving, and protecting the crime scene, requesting that the alleged victim not take any actions that could destroy physical evidence, ensuring the alleged abuser does not take any actions, which would destroy physical evidence, and to immediately notify Medical and Mental Health.

In addition, each Staff Member acknowledged the importance of the agency's response protocol to a sexual abuse allegation as well as his or her role as a First Responder. Every Staff Member interviewed articulated in detail the responsibilities of a First Responder and the importance of his/her responsibility when responding to an incident of sexual abuse or sexual harassment.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody.

Upon review of the policy, documentation, and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.65	<b>Coordinated response</b>
	<p data-bbox="252 168 896 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 411 358">Documents:</p> <p data-bbox="252 398 1348 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 660 598 694">Interviews conducted with:</p> <p data-bbox="252 734 454 768">Facility Warden</p> <p data-bbox="252 952 1348 1075">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states upon learning of an inmate sexual abuse or sexual harassment, the first staff member to respond to the report shall be required to:</p> <ul data-bbox="300 1142 1460 1780" style="list-style-type: none"> <li>• Provide immediate protection for the inmate from the alleged assailant;</li> <li>• Preserve and protect any potential crime scene until appropriate steps can be taken to collect evidence;</li> <li>• Request that the alleged victim not take any actions that could destroy physical evidence, including but not limited to, washing, showering, eating, drinking, using the restroom, or changing clothes;</li> <li>• Request that the alleged abuser not take any actions that could destroy physical evidence, including but not limited to, washing, showering, eating, drinking, using the restroom, or changing clothes;</li> <li>• Notify immediate Supervisor of the situation;</li> <li>• Immediately refer the inmate to medical for evaluation and treatment; the inmate will then be taken to the Emergency Room for further treatment and evidence collection. Follow up care will be provided as necessary;</li> <li>• If the first responder is not a security staff member, request that the alleged victim not take any action that could destroy physical evidence, and then notify security staff.</li> </ul> <p data-bbox="252 1888 1460 2011">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states in response to a report of an allegation of sexual abuse, the on-duty Detention Watch Commander will be required to:</p> <ul data-bbox="300 2078 1460 2157" style="list-style-type: none"> <li>• Ensure the inmate has been protected from the assailant and receiving timely medical treatment and crisis intervention services without financial cost;</li> </ul>

- Notify the on-duty Road Patrol Watch Commander, PREA Coordinator, On-Call Commander, and uniformed Road Patrol. If the preliminary investigation finds evidence of a crime, the uniformed Patrol Watch Commander will notify Major Crimes Unit who will conduct a criminal investigation;
- Determine the location of the crime scene, and secure it for Law Enforcement processing;
- Ensure that all incident reports, video recordings and all requested documentation are provided to the Major Crimes Unit Detective assigned to the criminal investigation;
- If the alleged perpetrator of a crime is a staff member, the Detention Commander shall be immediately notified along with the Law Enforcement Commander and Uniformed Road Patrol.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states in response to a report of an allegation of sexual harassment, the on-duty Detention Watch Commander will be required to:

- Ensure the inmate has been protected from the assailant;
- Gather all incident reports, video recordings, and all pertinent documentation for forwarding and review by the PREA Coordinator;
- The PREA Coordinator will assign the appropriate staff member to complete a preliminary investigation no later than 72 hours following the complaint;

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and inquired as to the implementation of the coordinated response to an allegation of sexual abuse or sexual harassment. The Facility Warden provided a detailed description of the response plan and each staff member's responsibility when responding to an allegation of sexual abuse or sexual harassment.

Upon review of the policies and upon completion of the on-site interview with the Facility Warden, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.66	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office and the Florida State Lodge Fraternal Order of Police, <i>Collective Bargaining Agreement</i> (5)</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Charlotte County Sheriff's Office has a collective bargaining agreement with the Florida State Lodge Fraternal Order of Police (FOP). The FOP is the representative for the purposes of collective bargaining with respect to wages, hours, and terms and conditions of employment for all members in the bargaining unit. The bargaining unit includes all employees of the Charlotte County Sheriff's Office, certified and civilian.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head regarding collective bargaining agreements the agency has entered into or renewed since August 20, 2012. The Agency Head confirmed to the Auditor, the Charlotte County Sheriff's Office has a collective bargaining agreement with the Florida State Lodge Fraternal Order of Police (FOP). Currently there are multiple bargaining agreements, which represent all employees to include law enforcement, correctional officers, and all civilian staff members. Additionally, the Agency Head explained that the agency is authorized to take disciplinary action without limitation, including demotion, reprimand, suspension, or dismissal dismiss for any cause noted in the Florida State Statutes.</p> <p>Upon review of the <i>Collective Bargaining Agreements</i> and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Designated Member Charged with Monitoring Retaliation</p> <p>PREA Coordinator</p> <p>Facility Warden</p> <p>Agency Head</p> <p>On-site Review Observations:</p> <p>Investigative Case files</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all staff shall immediately report any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident to include any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Inmates and staff have a right to be free from retaliation for reporting sexual abuse and sexual harassment.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states Watch Commanders are responsible for monitoring inmates and staff for a minimum of 90 days following the report of abuse to see if there are changes that may suggest possible retaliation. Changes may be noted in disciplinary reports, housing, program changes, or negative performance review or reassignments of staff. Periodic status checks will be conducted and upon determination that retaliation has or may occur, the Watch Commander will act promptly to remedy any such retaliation to include:</p>

- Notification to Command Staff;
- Change housing assignments or transfers for victims or abusers;
- Removal of alleged staff or inmate abusers from contact with victims;
- Provide emotional support through C.A.R.E. for inmates or staff who fear retaliation for reporting sexual abuse, sexual harassment, or for cooperating with investigations.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states monitoring beyond 90 days will occur if the initial monitoring indicates a continuing need. Any other individual who cooperates with an investigation and expresses fear of retaliation will also be protected against retaliation.

During the on-site phase of the audit, the Auditor conducted an interview with one of the Facility Staff Members designated with monitoring retaliation. The Staff Member articulated that in an effort to prevent retaliation against inmates and staff who report sexual abuse, harassment, or those who cooperate with an investigation, monitoring of those individuals would be conducted for at least 90 days. The Staff Member reviews disciplinary reports, inmate housing or transfers, and negative performance reviews of staff members. If there was a concern that potential retaliation might occur beyond the 90 days, monitoring would continue to until the issue or threat is resolved.

According to the information provided in the PAQ (§115.22(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported sixteen allegations of sexual abuse and sexual harassment. During the on-site phase of the audit, the Auditor met with the PREA Coordinator and the staff member tasked with entering the information into the PAQ to clarify the discrepancy. The nine additional incidents were initially reported in the Jail Management System as a sexual abuse or sexual harassment incident; however, after reviewing the nine incidents it was determined the incidents did not meet the criteria of a sexual abuse or sexual harassment incident. Therefore, for the purpose of this report, the total number of allegations of sexual abuse and sexual harassment are seven.

During the on-site phase of the audit, the Auditor reviewed the seven investigative files. Each file contained forms showing the retaliation monitoring interviews that were conducted with inmates who previously alleged sexual abuse or sexual harassment. Each form provided a detailed explanation of the interview, statements from the inmate, and comments from the Staff Member. The monitoring interviews were conducted at the 30, 60, and 90 day review dates.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided

documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office. Therefore, inmates in this targeted category were not interviewed.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody.

Additionally, during the twelve months prior to the audit, the agency reported no allegations of retaliation were reported nor where there any inmates placed in segregated housing due to risk of sexual victimization. Therefore, inmates in this targeted category were not interviewed.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and inquired on the different measures taken to protect inmates and staff from retaliation for reporting allegations of sexual abuse or sexual harassment. The Facility Warden confirmed the facility would take all necessary steps to protect any person who reports a sexual abuse / harassment incident from retaliation. The Facility Warden explained that housing changes or transfers of inmates, disciplinary action against staff members – including possible dismissal – or other means of removal of those who retaliate against someone who reports an allegation.

During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head and inquired how the agency protects inmates or staff from retaliation for sexual abuse or sexual harassment allegations. The Agency Head explained that the facility deploys numerous measures including housing, program, and work assignments changes. All inmates who report sexual abuse are monitored for retaliation for at least 90 days. Staff members are required to monitor the inmate with periodic status checks every 30 days to ensure they are not experiencing any additional problems. Inmates are also provided information for emotional support services through C.A.R.E.

The Auditor inquired to the Agency Head if an individual cooperates with an investigation expresses a fear of retaliation, what measures does the agency take to protect that individual against retaliation. The Agency Head explained the same process previously described is utilized. That inmate will also be subject to the 90-day monitoring.

Upon review of the policy, investigative files, and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.



115.68	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Facility Warden</p> <p>Staff who supervise inmates in Segregated Housing</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates at high risk of victimization or who have alleged sexual abuse, shall not be placed involuntarily segregated housing unless an assessment of all other available alternatives has been made and it is determined that there are not available alternative means of separation from likely abusers.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with a Facility Staff Member who supervises inmates in segregated housing. The Auditor inquired to the Facility Staff Member if an inmate who is placed in segregated housing for protection from sexual abuse or after having alleged sexual abuse, what restrictions are placed on the inmate. The Facility Staff Member clarified to the Auditor that the facility does not place inmates who have been a victim of sexual abuse in segregated housing unless the inmate (victim) requests Protective Custody. The Facility Staff Member explained inmates who are placed in Protective Custody (segregated housing for protection) do not have restrictions and retain the same privileges as inmates in general population housing, to include participating in programs and education opportunities. The Facility Staff Member explained if an inmate has restrictions placed on him it would be a result of their behavior or actions, and such action (being placed on restrictions) would require documentation explaining what has been restricted, duration of restriction, and reasons for initiating the restriction.</p> <p>During the 12 months prior to the audit, the facility reported there were no inmates who reported sexual abuse, being assigned to involuntary segregating housing. During the on-site phase of the audit, the Auditor reviewed six administrative investigations and one criminal investigation and confirmed the seven inmates who reported sexual abuse or sexual harassment were not placed into involuntary segregated housing. Therefore, inmates in this</p>

targeted category were not interviewed.

Additionally, during the twelve months prior to the audit, the agency reported no allegations of retaliation were reported nor where there any inmates placed in segregated housing due to risk of sexual victimization. Therefore, inmates in this targeted category were not interviewed.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden regarding inmates who alleged sexual abuse. The Facility Warden explained that the facility does not place inmates who have been a victim of sexual abuse in segregated housing unless it is the only means available to protect the inmate. Inmates who have made an allegation of sexual abuse and have stated that they are in fear for their safety can be placed in Protective Custody if requested.

Upon review of the policy and documentation provided and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office General Order 11.21, <i>Sexual Violence/Battery</i></p> <p>Investigative Case files (7) – Sexual abuse and sexual harassment</p> <p>Interviews conducted with:</p> <p>Investigative Staff</p> <p>On-site Review Observations:</p> <p>Training files</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states staff shall immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment or retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states it is the policy of the CCSO, to report all incidents of sexual battery/abuse immediately for investigation. The Charlotte County Sheriff's Office Major Crimes Unit has members trained to investigate allegations of sexual battery/assault and to collect and process forensic evidence.</p> <p>Charlotte County Sheriff's Office General Order 11.21, <i>Sexual Violence/Battery</i> states an inmate who alleges sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such as allegation. Additionally, the creditability of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as an</p>

inmate or staff member.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states the PREA Coordinator is responsible for reviewing all reported violations. If the violation is non-criminal, and determined to be a policy violation involving an employee, the PREA Coordinator will bring the information to the Bureau Commander to determine the course of investigation (refer to Internal Affairs). All felony criminal acts will be investigated by the Major Crimes Unit of the Charlotte County Sheriff's Office.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states the agency shall retain all administrative and criminal investigative reports, pursuant to a sexual battery investigation, as long as the alleged suspect is incarcerated, supervised, or employed by the agency plus five years.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states in addition to the general PREA training, investigators will receive training in conducting of such investigations in confinement settings. Specialized training shall include techniques for interviewing sexual abuse victims, appropriate application of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for prosecution referral.

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states the Department shall maintain documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

During the pre-on-site audit phase, the Auditor reviewed training documentation, which included the specialized training curriculum from the National PREA Resource Center developed by The Moss Group, *Specialized Training: Investigating Sexual Abuse in Confinement Settings* and training certificates of completion verifying investigative staff that conduct sexual abuse investigations attended and completed the required specialized training. During the on-site phase of the audit, the Auditor reviewed personnel files to verify training certificates were retained and on record.

During the on-site phase of the audit, the Auditor also interviewed an investigator assigned to the Charlotte County Sheriff's Office Major Crimes Unit who confirmed his attendance and successful completion of the required specialized training curriculum from the National PREA Resource Center developed by The Moss Group, Inc., *Specialized Training: Investigating Sexual Abuse in Correctional Settings*.

The Investigator clearly articulated the comprehensive training he had received which included investigating sexual harassment allegations, investigating sexual abuse allegations, understanding the impact of victim trauma, techniques for interviewing sexual abuse victims, preservation of crime scene and evidence collection, proper use of Miranda and Garrity and the importance of each, and criteria required for administrative action and prosecution referrals.

According to the information provided in the PAQ (§115.22(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported sixteen allegations of sexual abuse and sexual harassment. During the on-site phase of the audit, the Auditor met with the PREA Coordinator and the staff member tasked with entering the information into the PAQ to clarify the discrepancy. The nine additional incidents were initially reported in the Jail Management System as a sexual abuse or sexual harassment incident; however, after reviewing the nine incidents it was determined the incidents did not meet the criteria of a sexual abuse or sexual harassment incident. Therefore, for the purpose of this report, the total number of allegations of sexual abuse and sexual harassment are seven.

The seven allegations included six sexual harassment allegations and one sexual abuse allegation. The six sexual harassment allegations included one all staff-on-inmate allegation, which was closed as unfounded, and five inmate-on-inmate allegations which were closed as unsubstantiated. The one sexual abuse allegation was an inmate-on-inmate allegation that was closed as unfounded.

During the on-site phase of the audit, the Auditor reviewed six administrative investigations and one criminal investigations. All of these cases were selected and reviewed based upon the outcome and the Auditor's requirement to review all of the required steps and processes to verify compliance with multiple PREA Standards. Upon completion of reviewing all case files, the Auditor determined that the facility (to include but not limited to Investigators, Staff First Responders, Medical and Mental Health, PREA Compliance Manger, Supervisory Staff, etc.) followed the required steps and processes for all reported allegations.

Each administrative and criminal investigative case reviewed by the Auditor, contained all documented reports for that specific incident, an inmate body chart, inmate notifications, a description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and findings. Additionally, each completed report included an assessment as to whether staff actions or a failure to act on the part of staff contributed to the abuse. The Auditor reviewed each case thoroughly and systematically to ensure each case contained all of the correct procedures, completed documentation, and that all processes were completed as required, to include the report findings for the closed cases.

Upon review of the policies, investigative case files, and documentation listed above, and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.72	<b>Evidentiary standard for administrative investigations</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 1142 553">Investigative Case Files (7) – Sexual Abuse and Sexual Harassment</p> <p data-bbox="248 736 596 772">Interviews conducted with:</p> <p data-bbox="248 813 485 848">Investigative Staff</p> <p data-bbox="248 1032 1441 1238">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states it is the policy of the CCSO, to report all incidents of sexual battery/abuse immediately for investigation. The Charlotte County Sheriff's Office Major Crimes Unit has members trained to investigate allegations of sexual battery/assault and to collect and process forensic evidence.</p> <p data-bbox="248 1350 1461 1512">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p data-bbox="248 1624 1469 2089">During the on-site phase of the audit, the Auditor conducted an interview an Investigator assigned to the Major Crimes Unit of the Charlotte County Sheriff's Office. The Investigator provided the Auditor with a complete overview of the investigative process to include verifying specialized training credentials. The Investigator articulated the investigative process beginning with initial notification, investigation of the allegation, understanding the impact of victim trauma, techniques for interviewing sexual abuse victims, preservation of crime scene and evidence collection, proper use of Miranda and Garrity, and criteria required for administrative action and prosecution referrals. The Auditor inquired to the Investigator what standard of evidence is required to substantiate allegations of sexual abuse or sexual harassment. The Investigator explained that the agency should impose no standard higher than a preponderance of the evidence.</p>

During the on-site phase of the audit, the Auditor reviewed six administrative investigations and one criminal investigations. All of these cases were selected and reviewed based upon the outcome and the Auditor's requirement to review all of the required steps and processes to verify compliance with multiple PREA Standards. Upon completion of reviewing all case files, the Auditor determined that the facility (to include but not limited to Investigators, Staff First Responders, Medical and Mental Health, PREA Compliance Manger, Supervisory Staff, etc.) followed the required steps and processes for all reported allegations.

Each administrative and criminal investigative case reviewed by the Auditor, contained all documented reports for that specific incident, an inmate body chart, inmate notifications, a description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and findings. Additionally, each completed report included an assessment as to whether staff actions or a failure to act on the part of staff contributed to the abuse. The Auditor reviewed each case thoroughly and systematically to ensure each case contained all of the correct procedures, completed documentation, and that all processes were completed as required, to include the report findings for the closed cases.

Upon review of the policy and upon completion of the interview with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.73	<b>Reporting to inmates</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 411 360">Documents:</p> <p data-bbox="252 400 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 517 1120 551">Investigative Case files (7) – Sexual abuse and sexual harassment</p> <p data-bbox="252 736 596 770">Interviews conducted with:</p> <p data-bbox="252 810 491 844">PREA Coordinator</p> <p data-bbox="252 884 453 918">Facility Warden</p> <p data-bbox="252 1106 1455 1308">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states following an investigation into an inmate's allegation that he or she suffered sexual abuse, the PREA Coordinator will notify the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. All such notifications or attempted notifications shall be documented.</p> <p data-bbox="252 1424 1404 1626">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states following an inmate's allegation that a staff member has committed a sexual abuse against the inmate, the PREA Coordinator shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:</p> <ul data-bbox="300 1697 1423 1944" style="list-style-type: none"> <li>• The staff member is no longer posted within the inmate's unit;</li> <li>• The staff member is no longer employed at the facility;</li> <li>• The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>• The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ul> <p data-bbox="252 2056 1404 2132">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states following an inmate's allegation that he or she has been</p>

sexually abused by another inmate, the agency shall 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; or
- The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

According to the information provided in the PAQ (§115.22(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported sixteen allegations of sexual abuse and sexual harassment. During the on-site phase of the audit, the Auditor met with the PREA Coordinator and the staff member tasked with entering the information into the PAQ to clarify the discrepancy. The nine additional incidents were initially reported in the Jail Management System as a sexual abuse or sexual harassment incident; however, after reviewing the nine incidents it was determined the incidents did not meet the criteria of a sexual abuse or sexual harassment incident. Therefore, for the purpose of this report, the total number of allegations of sexual abuse and sexual harassment are seven.

During the on-site phase of the audit, the Auditor reviewed administrative and criminal investigative case files from the 12 months prior to the audit. The seven investigative case files that were closed with a final disposition contained an inmate notification form documenting the outcome of the case (substantiated, unsubstantiated, or unfounded) with the signature of the inmate documented on the notification.

During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office. Therefore, inmates in this targeted category were not interviewed.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody. The Auditor also inquired to the PREA Coordinator about the agency's notification procedures, to an alleged victim of sexual abuse, when the case is closed and whether the allegation has a final determination of substantiated, unsubstantiated, or unfounded. The PREA Coordinator confirmed she completes the inmate notifications on all investigations.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and inquired regarding how the facility notifies an inmate who makes an allegation of sexual abuse when the case is closed and a determination as to either substantiated,

unsubstantiated, or unfounded. The Facility Warden confirmed that the PREA Coordinator notifies the inmate of an outcome in all completed investigations.

Upon review of the policies, investigative case files, and upon completion of the interviews with staff, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.76	<b>Disciplinary sanctions for staff</b>
	<p data-bbox="252 168 896 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 411 358">Documents:</p> <p data-bbox="252 398 1348 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 517 1294 595">Charlotte County Sheriff's Office General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i></p> <p data-bbox="252 703 596 736">Interviews conducted with:</p> <p data-bbox="252 777 775 810">Administrative (Human Resources) Staff</p> <p data-bbox="252 925 1481 1261">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states to address the safety, prevention, detection, response, and treatment needs of inmates who have been sexually battered, the agency has a policy to investigate, discipline, and prosecute those who sexually batter/abuse inmates. Any employee, contractor, or volunteer who engages in sexual abuse will be prohibited from contact with inmates and investigated in accordance with agency policy General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i>. If the activity is found to be criminal in nature, it will be reported to the relevant licensing body.</p> <p data-bbox="252 1373 1461 1529">Charlotte County Sheriff's Office General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i> states members of the Office will not commit any acts or omissions, which constitute a violation of any of the rules, regulations, directives, or orders of the Sheriff or his Office.</p> <p data-bbox="252 1648 1477 1850">Pursuant to Florida State Statute, 943.1395(5), the Charlotte County Sheriff's Office notifies the Criminal Justice Services Training Center through the Florida Department of Law Enforcement when criminal violations of sexual abuse or sexual harassment are committed by staff. Florida State Statute requires notifications to be made within 45 days after the violations are sustained.</p> <p data-bbox="252 1966 1471 2085">The facility reported there have been no staff violations or terminations of the agency's sexual assault, sexual abuse, sexual harassment or sexual misconduct policies during the 12 months prior to the audit.</p>

During the on-site phase of the audit, the Auditor conducted an interview with Administrative / HR Staff Member who confirmed that Charlotte County Sheriff's Office has not had any staff members violate or terminated for violating the agency's policy against sexual abuse or sexual harassment during the past 12 months.

Upon review of the policy, personnel files, and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.77	<b>Corrective action for contractors and volunteers</b>
	<p data-bbox="252 168 896 201"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 246 523 280"><b>Auditor Discussion</b></p> <p data-bbox="252 324 411 358">Documents:</p> <p data-bbox="252 398 1350 474">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 515 1295 591">Charlotte County Sheriff's Office General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i></p> <p data-bbox="252 703 596 736">Interviews conducted with:</p> <p data-bbox="252 777 453 810">Facility Warden</p> <p data-bbox="252 922 1484 1258">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states to address the safety, prevention, detection, response, and treatment needs of inmates who have been sexually battered, the agency has a policy to investigate, discipline, and prosecute those who sexually batter/abuse inmates. Any employee, contractor, or volunteer who engages in sexual abuse will be prohibited from contact with inmates and investigated in accordance with agency policy General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i>. If the activity is found to be criminal in nature, it will be reported to the relevant licensing body.</p> <p data-bbox="252 1370 1461 1532">Charlotte County Sheriff's Office General Order 3.50, <i>Guidelines for Appropriate Conduct/Disciplinary Procedures</i> states members of the Office will not commit any acts or omissions, which constitute a violation of any of the rules, regulations, directives, or orders of the Sheriff or his Office.</p> <p data-bbox="252 1644 1449 1765">The facility reported there have been no contractor or volunteer violations or terminations of the agency's sexual assault, sexual abuse, sexual harassment or sexual misconduct policies during the 12 months prior to the audit.</p> <p data-bbox="252 1877 1455 2128">During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden regarding any violation of the facility's sexual abuse or sexual harassment by a contractor or volunteer. The Facility Warden explained that the incident would be reported to the PREA Coordinator who would then request an investigation by a Major Crimes Unit Investigator. The Facility Warden also explained once the investigation is completed and if findings warranted, the incident would be reported to any relevant licensing entities and the</p>

contractor or volunteer would be prohibited from any further contact with the agency.

Upon review of the policy and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office Procedure P-12-006, <i>Inmate Discipline</i></p> <p>Interviews conducted with:</p> <p>Facility Warden</p> <p>Medical / Mental Health Staff</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates may be disciplined when an administrative investigation has found that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states discipline will commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history and sanctions imposed for comparable offense by other inmates with similar histories. The disciplinary process shall consider whether the inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any should be imposed.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states for the purpose of the disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates may be disciplined for sexual contact with a staff member only if the staff member did not consent to such contact.</p>

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and discussed the facility's policy on disciplinary sanctions for an inmate after an administrative or criminal finding that the inmate engaged in inmate-on-inmate sexual abuse. The Facility Warden referred to the existing policy that an inmate would be subject to disciplinary sanctions, which would be conducted in accordance to the formal disciplinary process.

During the on-site phase of the audit, the Auditor conducted an interview with Medical and Mental Health Staff and discussed the victim advocate services available to inmates and counseling services available for abusers. The Medical and Mental Health Staff explained the services provided at the facility and through the local county crisis center (C.A.R.E.) and include one-on-one counseling and support groups. These services are offered for victims of sexual abuse or sexual harassment as well as offenders of sexual abuse.

Upon review of the policy, and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Inmates who disclose Sexual Victimization at Risk Screening</p> <p>Staff responsible for Risk Screening</p> <p>On-site Review Observations:</p> <p>Inmate records of Health Appraisal / Medical Screening</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states when an inmates reports having been a victim of past sexual abuse/assault whether it occurred in an institutional setting or in the community, shall refer the inmate to Mental Health Services. Mental Health Services staff shall assess the inmate's need for treatment and discuss available options within 14 days of intake screening.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states any information relating to sexual victimization or abuse that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners, and correctional staff as necessary, to inform treatment plans and security and management decisions including housing and program assignments as required by law.</p> <p>During the on-site phase of the audit, the Auditor inquired to the three Classification Officers interviewed, how the Charlotte County Sheriff's Office protects such sensitive information. The Classification Officers each stated the access to such information is strictly limited to Classification Staff, Medical, and Mental Health and Supervisory Correctional Staff when necessary.</p> <p>During the on-site phase of the audit, the Auditor inquired to the PREA Coordinator how the facility protects sensitive information, in particular an inmate's risk assessment. The PREA</p>

Coordinator explained how the risk assessments are maintained securely and only Classification Staff, Medical, and Mental Health have access to the risk assessments.

During the on-site phase of the audit, the Auditor reviewed thirteen inmate records. These records were selected based upon either inmates who reported sexual abuse or sexual harassment allegations, inmates who reported sexual victimization during intake, length at facility, and inmates that disclosed sexual orientation as gay or bisexual. Each file contained the initial risk screening form as well as the 30-day reassessment form; all were filled out completely and in accordance to the agency's policy.

During the 12 months prior to the audit, the facility reported in the PAQ there were no inmates at risk of sexual victimization being assigned to involuntary segregated housing. Therefore, no interviews conducted with inmates at risk of sexual victimization being assigned to involuntary segregated housing. During the on-site phase of the audit, the Auditor interviewed three Classification Officers and the PREA Compliance Manager and each confirmed the information previously provided by the facility in the PAQ was correct

Upon review of the policy, documentation, and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Medical / Mental Health Staff</p> <p>Security Staff / Non-Security Staff First Responders</p> <p>PREA Coordinator</p> <p>On-site Review Observations:</p> <p>Investigative Files</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigations arising out of the incident.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmate victims of sexual abuse will be provided follow-up services, treatment plans, and referrals for continued health care consistent with the community level of care.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmate victims of sexual abuse, will be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care, as medically appropriate.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates that have previously perpetrated sexual abuse,</p>

whether it occurred in an institutional setting or in the community, staff will ensure the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of intake screening.

During the on-site phase of the audit, the Auditor conducted an interview with the Medical and Mental Health Staff at the facility. Medical Staff confirmed that inmate victims are provided immediate access to medical treatment as well as crisis intervention, therapy, and counseling services. The Medical and Mental Health Staff explained the services provided at the facility and through the local county crisis center and include one-on-one counseling and support groups. These services are offered for victims of sexual abuse or sexual harassment as well as offenders of sexual abuse.

During the on-site phase of the audit, the Auditor conducted interviews with a random sample of staff members. Each staff member interviewed articulated the agency's zero tolerance policy on sexual abuse and sexual harassment, their role and responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response, how to communicate effectively and professionally with inmates, and an inmates right to be free from sexual abuse and sexual harassment. Staff members also acknowledged that reports concerning sexual abuse or sexual harassment, whether reported verbally or in writing, are considered confidential and must be documented immediately.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody. Therefore, inmates in this targeted category were not interviewed.

Upon review of the policy, contract agreement, and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Interviews conducted with:</p> <p>Medical / Mental Health Staff</p> <p>PREA Coordinator</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates that have previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff will ensure the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of intake screening.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigations arising out of the incident.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmate victims of sexual abuse will be provided follow-up services, treatment plans, and referrals for continued health care consistent with the community level of care. The evaluation and treatment of such victims shall include as appropriate, follow-up services, and when necessary, referrals for continued care following a transfer to, or placement in, another facility, or a release from custody.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states inmates that have previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff will ensure the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of intake screening.</p>

Charlotte County Sheriff's Office General Order 17.06, *Inmate Sexual Abuse/Battery Prevention & Intervention* states inmate victims of sexual abuse, will be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care, as medically appropriate.

During the on-site phase of the audit, the Auditor conducted an interview with the Medical and Mental Health Staff at the facility. Medical Staff confirmed that inmate victims are provided immediate access to medical treatment as well as crisis intervention, therapy, and counseling services. The Medical and Mental Health Staff explained the services provided at the facility and through the local county crisis center (C.A.R.E.) and include one-on-one counseling and support groups. These services are offered for victims of sexual abuse or sexual harassment as well as offenders of sexual abuse.

During the 12 months prior to the audit, Charlotte County Sheriff's Office reported seven allegations of sexual abuse and sexual harassment; six of the seven were allegations of sexual harassment and the remaining allegation was sexual abuse. During the on-site phase of the audit, the Auditor was provided with an updated inmate roster, which provided documentation that all seven inmates, who reported an allegation of sexual abuse or sexual harassment, had been released and no longer in custody of the Charlotte County Sheriff's Office.

During the on-site phase of the audit, the Auditor conducted an interview with the PREA Coordinator. The PREA Coordinator confirmed the inmates who reported sexual abuse or sexual harassment allegations in the 12 months prior to the audit had been released and were no longer in custody. Therefore, inmates in this targeted category were not interviewed.

Upon review of the policy and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.86	<b>Sexual abuse incident reviews</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p>Charlotte County Sheriff's Office PREA Sexual Abuse Incident Review Reports</p> <p>Interviews conducted with:</p> <p>Facility Warden</p> <p>Incident Review Team</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states a PREA review team consisting of the Jail Commander, Assistant Jail Commander(s), and the PREA Coordinator will review all substantiated and unsubstantiated incident involving sexual abuse (except those determined to be unfounded) within 30 days of conclusion of the investigation.</p> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the PREA review team shall:</p> <ul style="list-style-type: none"> <li>• Gather input from line supervisors, Jail Investigators, and medical or mental health representative(s) and document on the PREA incident review form;</li> <li>• Consider whether the allegation or investigation indicates a need to change policy of practice to better prevent, detect, or respond to sexual abuse;</li> <li>• Consider whether the incident or allegation was motivated by race, ethnicity, LGBTI identification, status or perceived status; or gang affiliation, or other group dynamics in the facility;</li> <li>• Assess the adequacy of staffing levels in the area during different shifts;</li> <li>• Assess whether monitoring technology should be augmented to supplement supervision by staff.</li> </ul> <p>Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the Detention Administrative Commander will complete and submit a report of the findings to the Bureau of Detention Commander and PREA Coordinator. The report will include determinations made pursuant to the policy requirements and any recommendations for improvement. Any improvements made, as a result of the findings, as</p>

well as any recommendations that were not implemented will be documented in a follow up report within 60 days.

According to the information provided in the PAQ (§115.86(a)-2), during the past 12 months, Charlotte County Sheriff's Office reported one criminal investigation of alleged sexual abuse and six administrative investigations of alleged sexual harassment were completed at the facility. During the on-site phase of the audit, the Auditor conducted a review of the seven criminal and administrative investigative files. Each file contained a completed PREA Sexual Abuse Incident Review report, to include the investigations of sexual harassment. The reviews were completed by the PREA Incident Review Team and each review was completed within 30 days.

During the on-site phase of the audit, the Auditor conducted an interview with an Incident Review Team member and inquired if the PREA Review Team considers whether an incident or allegation was motivated by race, ethnicity, or gender identity and if the SAIR Team examines the area in the facility where the incident allegedly occurred. The Incident Review Team member confirmed the PREA Review Team does consider whether the incident was motivated by race, ethnicity, or gender identity, and gang affiliation. The PREA Review Team also tours the area where the alleged incident occurred as well as consider if additional monitoring technology should be deployed or augmented to supplement supervision by staff. The Incident Review Team member explained how touring the area in conjunction with reviewing monitoring technology provides the team with the best possible representation of an incident and assists the PREA Review Team in determining if changes or additions to monitoring technology is warranted.

During the on-site phase of the audit, the Auditor conducted an interview with the Facility Warden and discussed the incident review process. The Facility Warden explained the PREA Review Team includes the Jail Commander, Assistant Jail Commander(s), and the PREA Coordinator. The PREA Review Team always seeks input from Jail Investigators, Line Staff, and Medical and Mental Health personnel. The Facility Warden articulated the process of the incident review, including listing the elements required per the PREA standard. The Facility Warden explained how the PREA Review Team uses the information obtain from the review to determine if changes need to be made to the physical plant, surveillance systems, policy and procedure or any other change that would improve the safety of the inmate population and prevent sexual abuse.

Upon review of the policy and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

115.87	<b>Data collection</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 411 360">Documents:</p> <p data-bbox="252 400 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 517 983 551">Charlotte County Sheriff's Office PREA Year End Report</p> <p data-bbox="252 736 1469 983">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the PREA Coordinator will be responsible for collecting data for every allegation of sexual abuse in confinement settings and maintaining data in a secure location. Data collected will meet the requirements of the Department of Justice Survey of Sexual Violence (SSV). The PREA Coordinator will complete the survey and submit all data to the Department of Justice no later than June 30 of each year.</p> <p data-bbox="252 1099 1469 1391">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states on an annual basis, an analysis of data collected through the Sexual Abuse Incident Reviews as well as the data collected in compliance with the Department of Justice Survey of Sexual Abuse (SSV) will be prepared by the PREA Coordinator to include a comparison of current year's data and corrective action with those from prior years. The analysis shall also include an assessment of the agency's progress in addressing sexual abuse, to include policies, practices, training, response, and detection.</p> <p data-bbox="252 1503 1469 1704">During the pre-on-site phase of the audit, the Auditor reviewed the Survey of Sexual Violence Reports, and the prior Year End Report, which contained sexual abuse data collected with a standardized instrument. The standardized instrument used contained a set of definitions and data collected from incident reports, investigative files, and sexual abuse incident reviews. The Charlotte County Sheriff's Office publishes the reports on the agency website <a href="https://www.ccsso.org/Corrections/PR">https://www.ccsso.org/Corrections/PR</a></p> <p data-bbox="252 1760 347 1794"><a href="#">EA.cfm</a></p> <p data-bbox="252 1906 1469 2018">Upon review of the policy, Year End Report, and SSV Report, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.</p>

115.88	<b>Data review for corrective action</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 411 365">Documents:</p> <p data-bbox="248 405 1350 477">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="248 517 995 553">Charlotte County Sheriff's Office 2019 PREA Assessment</p> <p data-bbox="248 665 596 701">Interviews conducted with:</p> <p data-bbox="248 741 617 777">PREA Compliance Manager</p> <p data-bbox="248 817 491 853">PREA Coordinator</p> <p data-bbox="248 893 427 929">Agency Head</p> <p data-bbox="248 1037 1461 1323">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the PREA Coordinator will be responsible for collecting data for every allegation of sexual abuse in confinement settings and maintaining data in a secure location. Data collected will meet the requirements of the Department of Justice Survey of Sexual Violence (SSV). The data will also be utilized to improve the effectiveness of the agency's efforts toward sexual abuse prevention, detection, and response policies, practices, and training.</p> <p data-bbox="248 1435 1474 1686">During the pre-on-site phase of the audit, the Auditor reviewed the facility's Year End Reports, which contained sexual abuse data collected with a standardized instrument. The standardized instrument used contained a set of definitions and data collected from incident reports, investigative files, and sexual abuse incident reviews. The Charlotte County Sheriff's Office publishes the reports on the agency website <a href="https://www.ccsso.org/Corrections/PREA.cfm">https://www.ccsso.org/Corrections/PREA.cfm</a></p> <p data-bbox="248 1798 1477 2004">During the on-site phase of the audit, the Auditor conducted an interview with the PREA Compliance Manager and inquired if the agency reviews data collected and aggregated pursuant to §115.87. The PREA Compliance Manager explained how the agency collects data in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies.</p> <p data-bbox="248 2116 1391 2152">During the on-site phase of the audit, the Auditor conducted an interview with the PREA</p>

Coordinator regarding how data is collected pursuant to PREA Standard §115.87. The PREA Coordinator acknowledged that the data collected is securely retained at the state level and the agency takes corrective action on an ongoing basis based on the collected data. The PREA Coordinator confirmed the preparation and completion of an Annual Report to include any potential corrective action if warranted. The PREA Coordinator confirmed the agency redacts sensitive information and all public data information.

During the on-site phase of the audit, the Auditor conducted an interview with the Agency Head and inquired how the agency uses incident-based sexual abuse data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. The Agency Head explained that sexual abuse data is collected annually and utilized to complete the Department of Justice Survey of Sexual Victimization. The data is collected and then reviewed by the PREA Coordinator who then completes a report of the findings and any potential corrective action. The Auditor inquired as to who is responsible for approving annual reports written pursuant to §115.88. The Agency Head confirmed he is responsible for reviewing and approving the annual PREA report.

Upon review of the policy, Year End Reports, and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.89	<b>Data storage, publication, and destruction</b>
	<p data-bbox="252 170 895 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 408 360">Documents:</p> <p data-bbox="252 405 1350 472">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i></p> <p data-bbox="252 595 596 629">Interviews conducted with:</p> <p data-bbox="252 663 491 696">PREA Coordinator</p> <p data-bbox="252 808 1469 976">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the PREA Coordinator is responsible for collecting data for every allegation of sexual abuse in confinement settings and maintaining the data in a secure location.</p> <p data-bbox="252 1088 1469 1245">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states all sexual abuse data will be securely retained in accordance with the Florida Division of Archives Guidelines for a minimum of ten years after the date of the initial collection.</p> <p data-bbox="252 1357 1469 1693">Charlotte County Sheriff's Office General Order 17.06, <i>Inmate Sexual Abuse/Battery Prevention &amp; Intervention</i> states the annual analysis will be made available to the community through the agency's website. Personal identifiers will be removed from the report. Redaction of specific material from the report is authorized when the publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. The Charlotte County Sheriff's Office publishes the reports on the agency website <a href="https://www.ccsso.org/Corrections/PR_EA.cfm">https://www.ccsso.org/Corrections/PR_EA.cfm</a></p> <p data-bbox="252 1805 1485 2007">During the pre-on-site phase of the audit, the Auditor reviewed the Department of Justice Survey of Sexual Violence Reports and Year End Reports, which contained sexual abuse data collected with a standardized instrument. The standardized instrument used contained a set of definitions and data collected from incident reports, investigative files, and sexual abuse incident reviews.</p> <p data-bbox="252 2119 1390 2152">During the on-site phase of the audit, the Auditor conducted an interview with the PREA</p>

Coordinator regarding how data is collected pursuant to PREA Standard §115.87. The PREA Coordinator acknowledged that the data collected is securely retained at the state level and the agency takes corrective action on an ongoing basis based on the collected data. The PREA Coordinator confirmed the preparation and completion of an Annual Report to include any potential corrective action if warranted. The PREA Coordinator confirmed the agency redacts sensitive information and all public data information.

Upon review of the policy and upon completion of staff interviews, Charlotte County Sheriff's Office demonstrated facility-wide practices that are consistent with policy and the requirements of the PREA standard.

115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Charlotte County Sheriff's Office had its first PREA Audit conducted on March 27 – 28, 2017; the first year of the second three-year auditing cycle. This audit was the facility's second audit and was conducted on September 16 – 18, 2020; the first year of the third three-year auditing cycle.</p> <p>The Auditor was provided access to and observed all areas of the facility and outside compound. The Auditor was permitted to request and receive copies of any relevant documents.</p> <p>The Auditor was permitted to conduct private interviews with inmates and staff. The Auditor verified the posting of the audit notifications including posting of the audit in all housing areas and common areas accessible and visible for inmates and staff. The Auditor verified through inmate and staff interviews that inmates and staff were permitted to send confidential correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Charlotte County Sheriff's Office has published the prior PREA Audit Report on the agency website. The Auditor reviewed the prior PREA Audit Report (March 2017) for Charlotte County Sheriff's Office.

<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for	yes

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

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes

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

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
<b>115.16 (a)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual	yes

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

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

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

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

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	no
<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
<b>115.21 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

<b>115.21 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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
<b>115.21 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<b>115.52 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	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
<b>115.52 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

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

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

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

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

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

<b>115.67 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.67 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

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

<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes

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

<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	no
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes

<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.82 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.82 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.82 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes

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

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

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

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

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

<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	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
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	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