

# PREA Facility Audit Report: Final

**Name of Facility:** Georgetown County Detention Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/22/2022

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> Darla P. O'Connor	<b>Date of Signature:</b> 08/22/2022

AUDITOR INFORMATION	
<b>Auditor name:</b>	O'Connor, Darla
<b>Email:</b>	darla@preaauditing.com
<b>Start Date of On-Site Audit:</b>	07/28/2022
<b>End Date of On-Site Audit:</b>	07/29/2022

FACILITY INFORMATION	
<b>Facility name:</b>	Georgetown County Detention Center
<b>Facility physical address:</b>	2394 Browns Ferry Road, Georgetown, South Carolina - 29440
<b>Facility mailing address:</b>	

Primary Contact	
<b>Name:</b>	Brittany Keefner
<b>Email Address:</b>	bkeefner@gtcounty.org
<b>Telephone Number:</b>	8434366032

Warden/Jail Administrator/Sheriff/Director	
<b>Name:</b>	Wayne Owens
<b>Email Address:</b>	wowens@gtcounty.org
<b>Telephone Number:</b>	8435456114

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

Facility Health Service Administrator On-site	
Name:	Abbie Porter
Email Address:	aporter@mediko.com
Telephone Number:	8435453410

Facility Characteristics	
Designed facility capacity:	212
Current population of facility:	111
Average daily population for the past 12 months:	123
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	19-78
Facility security levels/inmate custody levels:	minimum, medium, maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	26
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	2
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Georgetown County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	430 North Fraser Street, Georgetown, South Carolina - 29440
Mailing Address:	
Telephone number:	

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

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Brittany Keefner	<b>Email Address:</b>	bkeefner@gtcounty.org

SUMMARY OF AUDIT FINDINGS	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
<b>Number of standards exceeded:</b>	
1	<ul style="list-style-type: none"> <li>• 115.65 - Coordinated response</li> </ul>
<b>Number of standards met:</b>	
44	
<b>Number of standards not met:</b>	
0	

# POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-07-28
2. End date of the onsite portion of the audit:	2022-07-29

### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Myrtle Beach Rape Crisis Center Georgetown Memorial Hospital Just Detention International South Carolina Coalition Against Domestic Violence.

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	212
15. Average daily population for the past 12 months:	123
16. Number of inmate/resident/detainee housing units:	9
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	111
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	2
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	12

40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	6
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	1
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	Thirteen inmates from the targeted population were interviewed. The Auditor interviewed the following: One physically disabled inmate Five Cognitively disabled inmates Two low vision or blind inmates Three LEP inmates One gay, lesbian, bisexual inmate One inmate who reported abuse
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	26
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	3
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	GCDC reported that due to COVID-19 they have not been utilizing or retaining volunteers. The three contractors are two kitchen staff and one nurse.

# INTERVIEWS

## Inmate/Resident/Detainee Interviews

### Random Inmate/Resident/Detainee Interviews

<b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	12
<b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
<b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	<p>The institutional count the first day of the on-site audit was 111. The Auditor used the alphabetical housing unit rosters of inmates to randomly select inmates from various age groups, ethnicities, and races. The Auditor randomly chose inmates from each facility to interview, ensuring diversity in age and race.</p> <p>During the on-site tour, the Auditor had several conversational encounters with inmates regarding sexual safety, including education, reporting, communication, responses, etc. This information was used to supplement the overall audit information gathering process. A total of twelve formal random inmate interviews were conducted with inmates.</p> <p>As a result of the audit notice posting the Auditor did not receive any correspondence.</p> <p>At the beginning of each interview the Auditor made clear to the inmate why she was at the facility, what her role was in the PREA process and explained why interviews were needed. The Auditor also discussed the inmate's participation as voluntary and while helpful, was not required or mandated in any way. The Auditor then asked if the inmate wanted to participate and if so, could she ask a few questions. The Auditor would then ask the protocol questions. All random inmates willing participated in the interview process. All responses were typed directly onto the protocol form.</p> <p>During the random interviews, no PREA issues were revealed, no other interview protocols were accessed. All random inmates responded they were aware of the zero-tolerance policy, they knew how to report an incident, they felt they could report anonymously, they knew they had a right to be free from retaliation</p>
<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p><b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>The facility population the first day of the on-site audit was 111. According to the PREA Auditor Handbook, a minimum of ten random inmates were to be interviewed. The Auditor interviewed twelve random inmates.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>13</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p><b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>5</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The roster of targeted inmates did not include any inmates who were hard of hearing or deaf. During the facility tour the Auditor did not observe any inmates who appeared to be deaf or hard of hearing. Medical staff confirmed they were unaware of any inmate who was deaf or hard of hearing.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>3</p>

<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>During the facility tour the Auditor did not observe any inmates who appeared to be transgender or intersex. Medical staff confirmed they were unaware of any inmate who identified as transgender or intersex.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>1</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The roster of targeted inmates did not include any inmates who disclosed prior victimization. The PAQ reflects zero inmates disclosed prior victimization during intake in the past twelve months. Intake and classification could not recall any inmate disclosing prior victimization during the past twelve months.</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>



<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The roster of targeted inmates did not include any inmates who had been placed in segregation. The PAQ reflects zero inmates had been placed in segregation during the past twelve months for PREA related issues.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The Auditor requested and received a roster of inmates who fell into the targeted categories. There were inmates who fell into six targeted categories. The Auditor randomly chose inmates from each category to interview, ensuring diversity in age and race. Once selected each inmate was put on "call- out" with a time to report to the private space designated for interviews.</p>

### Staff, Volunteer, and Contractor Interviews

#### Random Staff Interviews

<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>13</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>GCDC has a small staff of twenty-six. The random staff were chosen from a list of staff that were not interviewed under a specialized protocol.</p>

#### Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>13</p>
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<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>78. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>79. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Agency contract administrator</li> <li><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</li> <li><input type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</li> <li><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</li> <li><input checked="" type="checkbox"/> Medical staff</li> <li><input checked="" type="checkbox"/> Mental health staff</li> <li><input checked="" type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</li> <li><input checked="" type="checkbox"/> Administrative (human resources) staff</li> <li><input checked="" type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting criminal investigations</li> <li><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</li> <li><input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</li> <li><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</li> <li><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</li> <li><input checked="" type="checkbox"/> First responders, both security and non-security staff</li> <li><input checked="" type="checkbox"/> Intake staff</li> <li><input checked="" type="checkbox"/> Other</li> </ul>
<p><b>If "Other," provide additional specialized staff roles interviewed:</b></p>	<p>The Auditor also interviewed classification and mailroom staff. The Auditor did not interview staff who supervise inmates in segregated housing because there had been zero inmates held in segregation related to PREA in the past twelve months.</p>
<p><b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	1
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	Using the list of specialized staff provided, the Auditor was able to select individuals for interviews. All specialized staff answers were based on the line of questioning on the specific interview protocols for their position and responsibilities. In several instances a single person was responsible for covering multiple, separate protocols, i.e. First responder/Intermediate or higher staff, Intake staff/Monitor for retaliation, Intake staff/Screening for risk of victimization and abusiveness, etc. There were thirteen individuals interviewed using nineteen protocols.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

<b>84. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No

<p><b>88. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>The Georgetown County Detention Center (GCDC) is a minimum to maximum security adult co-correctional jail with a capacity of 212. GCDC is located at 2394 Browns Ferry Road, Georgetown, SC 29440.</p> <p>The GCDC opened in March 1996. The Detention Center Director and Detention Center Command Staff manage the Detention Center as directed by the Georgetown County Sheriff.</p> <p>The GCDC houses male and female adult inmates, from the state as well as the federal courts. GCDC manages inmate work crews for county agencies. These work crews have responsibilities that range from picking up litter on the county roads to assisting with clean-up after hurricanes.</p> <p>The physical plant consists of one building with two floor levels. The facility is entered through the second floor. This second floor houses the lobby area; administrative area with conference rooms and training areas. The offices of the Director, Major, Captain, Administrative Assistant, Victim Advocate, and PREA Compliance Manager are in one cluster of offices on the second floor.</p> <p>The second floor also houses the main video surveillance control room and visitation area.</p> <p>The first floor houses the intake, receiving and booking area. This area has one inmate toilet and two showers, one for female and one for male inmates. It has five holding cells for inmate as they await processing and intake. Additionally there is a private search area for all incoming inmates.</p> <p>In another area of the first floor is medical, with examination rooms, pharmacy, nurses' station, waiting room, etc.</p> <p>The housing units are on the first floor and are divided into two towers. Tower 1 has cell blocks A, B, C, and D. Cell block A has eight male double occupancy cells. It has a small medical area and a multipurpose room with a limited outside recreational area. Cell block B has four male double occupancy cells and an intake PREA video room. Cell Block C is dedicated to female inmates and has ten double occupancy cells and a PREA video room. Cell block D has six male, single occupancy cells and a property room.</p> <p>Additionally tower one has the tower one control room, an interview room and virtual bond court.</p> <p>Tower two has cell blocks E, F, G, H, and I. Cell blocks F, G, and H are double occupancy cells for male inmates. Cell blocks E and I are open-bay dormitory style housing units for male inmates. The inmates assigned to E are the inmates who work outside of the facility. Cell block I houses in-house inmate workers, a multi-purpose room for visitation, and a limited outside recreational yard. In all housing units' inmates can change clothes, shower and use the toilet without being easily observed by an individual of the opposite sex.</p> <p>The main hallway which connects the two towers, includes medical area, kitchen, staff bathroom, chapel, programs office, shift supervisor office, training supervisor office, library, facility laundry, and supply room. The kitchen area includes a staff bathroom, inmate toilet, food pantry, kitchen staff office, and staff dining.</p> <p>GCDC uses hotboxes to serve meals to inmates on their unit.</p>
<p><b>Documentation Sampling</b></p>	

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

**90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?**

- Yes  
 No

**91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).**

Personnel and Training Files:  
 The PAQ reflects 26 staff at GCDC. There was a total of seventeen record reviews conducted on staff from various categories. The records were selected by randomly choosing the records of new hires; newly promoted employees and employees who had been at GCDC for longer periods of time. All records contained the required documentation, i.e., initial criminal history check, administrative adjudication, initial PREA education with acknowledgment form signed, PREA annual training and five-year criminal history check, when applicable.

Inmate Records:  
 There were thirty-five inmate records, chosen randomly from the master roster, with varying arrival dates. All records had a signed acknowledgment sheet, had received PREA information and viewed the PREA video. All thirty-five inmates had received PREA information during intake, had their PREA screening within 72 hours of admission, and had comprehensive PREA education within 30-days of intake.

Sexual Abuse and Sexual Harassment Allegations:  
 According to the PAQ, GCDC reported they had three allegations of sexual abuse and sexual harassment in the past twelve months. The Auditor was provided the grievance or incident report and the investigative report for each of the allegations.  
 All three reports were reviewed using the PREA audit investigative records review tool to record the following information relative to each investigative report:

- Case# / ID
- Date of Allegation
- Date of Investigation
- Staff-or-Inmate-on-Inmate
- Sexual Abuse or Sexual Harassment
- Final Disposition
- Is Disposition Justified?
- Investigating Officers
- Notice Given to Inmate

Investigation Files:  
 Information received regarding the allegations of sexual abuse indicate in the past twelve-months there had been a total of three allegations made. Of those three allegations, two were inmate-on-inmate and one was staff-on-inmate. After a thorough investigation the staff-on-inmate allegation was deemed unfounded. This inmate was disciplined for filing a false report after he recanted and said nothing had happened and he made it up.  
 One of the inmate-on-inmate allegations was deemed unsubstantiated, for lack of verifiable evidence. The other inmate-on-inmate sexual abuse allegation was investigated criminally and was found to be substantiated. As a result, a warrant was issued for the perpetrator for Assault and Battery 2nd Degree. She had a bond hearing with a Magistrate and the bond was set at \$5,000, once her current sentence was satisfied.  
 There were zero inmates transported for forensic examinations in the past twelve months. This was confirmed by the PCM as well as SANE personnel.

The Auditor scheduled the exit briefing with the Detention Center Director, the PCM and the Captain, for the final day of the audit, July 29, 2022. During the exit briefing the executive staff members were provided with an overview of what had been observed and information about the interim or final report which is due no later than September 12, 2022.

The institution staff I encountered were courteous, knowledgeable, and professional. Their combined demeanors and attitudes displayed a culture that is acutely aware of the significance of sexual safety and view the responsibility to protect inmates and staff from sexual victimization as a high priority.

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

### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	2	1	1	0
Staff-on-inmate sexual abuse	1	0	1	0
<b>Total</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>0</b>

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

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

### Sexual Abuse and Sexual Harassment Investigation Outcomes

#### Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	1	0
<b>Staff-on-inmate sexual abuse</b>	0	1	0	0
<b>Total</b>	0	1	1	0

**Sexual Harassment Investigation Outcomes**

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

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

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

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

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

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**



98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	3
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	2
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>Staff-on-inmate sexual abuse investigation files</b>	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
a. Explain why you were unable to review any sexual harassment investigation files:	GCDC reported there were zero sexual harassment allegations in the past twelve months.

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

<p>108. Enter the total number of <b>INMATE-ON-INMATE SEXUAL HARASSMENT</b> investigation files reviewed/sampled:</p>	<p>0</p>
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<p>109. Did your sample of <b>INMATE-ON-INMATE SEXUAL HARASSMENT</b> files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>110. Did your sample of <b>INMATE-ON-INMATE SEXUAL HARASSMENT</b> investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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**Staff-on-inmate sexual harassment investigation files**

<p>111. Enter the total number of <b>STAFF-ON-INMATE SEXUAL HARASSMENT</b> investigation files reviewed/sampled:</p>	<p>0</p>
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<p>112. Did your sample of <b>STAFF-ON-INMATE SEXUAL HARASSMENT</b> investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>113. Did your sample of <b>STAFF-ON-INMATE SEXUAL HARASSMENT</b> investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>GCDC reported no sexual harassment allegations in the past twelve months.</p>
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**SUPPORT STAFF INFORMATION**

**DOJ-certified PREA Auditors Support Staff**

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

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

<p>121. Who paid you to conduct this audit?</p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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<p>Identify the name of the third-party auditing entity</p>	<p>Correctional Management and Communications Group, LLC</p>
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## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

**115.11 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 102.0, Organizational Chart/Chain of Command, dated January 1, 2018
- GCDC Standard Operating Procedure (SOP) PREA
- GCDC Organizational Chart

Interviews:

- Facility Head - Detention Center Director
- PREA Compliance Manager (PCM)

Provision (a):

The Pre-Audit Questionnaire (PAQ) indicates GCDC has zero-tolerance as it relates to all forms of sexual abuse or sexual harassment in the institution, as well as any contracts over which it has control. The PAQ states the policy outlines how the facility will implement prevention, detection and response to sexual abuse and sexual harassment. It further asserts the policy includes clear definitions of prohibited behaviors and approved sanctions for participation in those behaviors.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, mandates an agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, and GCDC Standard Operating Procedure (SOP) PREA both mandate zero-tolerance of sexual abuse and sexual harassment.

GCDC Standard Operating Procedure (SOP) PREA, mandates a zero-tolerance policy for sexual abuse and sexual harassment must be in place and implemented by the facility. Further the policy outlines the facility's approach to preventing, detecting, and responding to such conduct. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment and includes sanctions for those found to have participated in prohibited behaviors. The policy addresses detection of sexual abuse and sexual harassment through inmate education, staff training, and intake screening for risk of sexual victimization and abusiveness. Additionally, it includes but is not limited to responding to sexual abuse and sexual harassment through reporting, investigations, assessments, crisis intervention, and disciplinary sanctions for inmates and staff.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, specifically addresses the requirements of this provision. Additionally, it identifies the role of the PREAS Coordinator and PREA Compliance Manager. The reviewed policy is consistent with the PREA Standards and outlines the agency's approach to sexual safety.

GCDC has designated an upper-level, agency-wide PREA Coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. The positions and hierarchy within GCDC for PREA personnel was confirmed through a review of the agency PREA organizational chart.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape

Elimination Act, effective January 1, 2018, establishes, identifies, and outlines the roles and responsibilities of the PCM, which includes the collaboration with various levels of institutional management. Further, it establishes and identifies the responsibilities and procedures for the PCM to coordinate the institutions efforts to comply with PREA standards. Each of the reviewed policies is consistent with PREA standards and outlines the agency's approach to sexual safety.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 3, 1, and GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 102.0, Organizational Chart/Chain of Command, dated January 1, 2018, p. 1, 4, both mandate the Detention Center Director will designate an employee with sufficient time and authority to develop, implement, manage, and oversee efforts to address the requirements contained in the PREA Standards. The PREA Coordinator will report directly to the Detention Center Director for all matters related to PREA abuse and sexual harassment and the designation of an Agency PREA Coordinator.

Conclusion:

Based upon the review and analysis of the available documentation, the Auditor has determined the facility is compliant with every provision of the standard relating to zero-tolerance policy toward sexual abuse and sexual harassment and the designation of an Agency PREA Coordinator.

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Facility Head - Detention Center Director</li> </ul> <p>Provision (a):</p> <p>The Pre-Audit Questionnaire (PAQ) indicates GCDC has not entered into or renewed a contract for the confinement of inmates. GCDC does not individually contract for the confinement of inmates.</p> <p>Through the interview process, the Detention Center Director confirmed GCDC does not individually contract for the confinement of inmates.</p> <p>Provision (b):</p> <p>See Provision (a).</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses contracting with other entities for the confinement of inmates. No recommendations or corrective action is required.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 103.0, Staffing Plans and Requirements, dated January 1, 2018
- GCDC Standard Operating Procedure (SOP) PREA
- GCDC Staffing Plan

Interviews:

- Facility Head - Detention Center Director
- PREA Compliance Manager
- Intermediate-or-Higher Level Staff

Provision (a):

The Pre-Audit Questionnaire (PAQ) indicates GCDC has a staffing plan, and the plan addresses each of the thirteen items listed in Provision (a). In addition, the GCDC Staffing Plan indicates it is the policy of the facility to ensure that all relieved posts are staffed at the times specified.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 103.0, Staffing Plans and Requirements, dated January 1, 2018, p. 1, A, 1, specifies in part, the Detention Center Director will ensure that an up-to-date staffing analysis is completed for the detention center to provide adequate levels of staffing and, where applicable, video monitoring, to promote staff-inmate ratios and supervision. It goes on to say that the following considerations will be taken into account:

1. Generally accepted detention and correctional practices;
2. Any judicial findings of inadequacy;
3. Any findings of inadequacy from Federal investigative agencies;
4. Any finding of inadequacy from internal or external oversight bodies;
5. Composition of the inmate population;
6. All components of the detention center's physical plant (to include blind spots or areas where staff or inmates may be isolated);
7. The number and placement of supervisory staff;
8. Institutional programs occurring on particular shifts;
9. Applicable state or local laws, regulations or standards<sup>1</sup>;
10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse.

The Auditor reviewed copies of the 2020, 2021 and 2022 annual PREA staffing plans. The plans were comprehensive and addressed each of the bullet items required according to Provision (a). On an annual basis, quality assurance audits are conducted to ensure compliance with the established staffing model. The staffing plan is predicated upon a daily facility inmate population of 550.

The PAQ confirms the average daily number of inmates during the past 12 months has been 131.

Interviews with the PCM and other executive staff indicated random reviews of the staffing levels, how they affect the inmate



programming, various classification counts, as well as any changes or modification to the video monitoring system are consistently conducted. Reviews of other concerns, such as the physical plant configuration, internal or external oversight bodies, inmate population configuration, and placement of supervisory staff, line-staff needs and any prevalence of substantiated or unsubstantiated incidents of sexual abuse are also consistently conducted.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 103.0, Staffing Plans and Requirements, dated January 1, 2018, p. 2, C, specifies in situations where the staffing plan is not able to be complied with, the Detention Center Director will consult with the Sheriff to develop corrective action plans designed to resolve the same. The Director will be required to document all corrective action taken and any continued deviations from the plan, e.g., staffing shortages, vacancies, recruiting or retention issues, reduced or unapproved funding requests for additional staff, etc.

Provision (c):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 103.0, Staffing Plans and Requirements, dated January 1, 2018, p. 2, B, specifies at a minimum, the Detention Center Director will be responsible for reviewing the staffing analysis on at least an annual basis to assess, determine and document whether adjustments are needed to the staffing plan, video monitoring systems and technology, or to the resources the detention center has to commit in order to adhere to the staffing plan. All reviews will be documented.

Provision (d):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 8, 5, C, states consistent with PREA standards, intermediate level and upper-level supervisory employees will be required to conduct and document daily unannounced rounds to identify and deter sexual abuse and harassment. Supervisory employees will conduct such rounds on both day and evening shifts. All documentation pertaining to such rounds will be maintained and made and accessible to the PREA Coordinator for review and record keeping. Unannounced rounds are recorded in Tower and Sergeant Logbooks.

During the days the Auditor was on site; numerous supervisors were observed walking and working in various capacities throughout the facility. When interviewing inmates, it was confirmed the USPPM, and other supervisory staff routinely walk around and through the institution and are visible and available to all inmates.

There were interviews and informal discussions with intermediate or higher-level staff. These interviews and discussions affirmed that staff are making unannounced rounds to all areas of the facility, with no warning to staff.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses supervision and monitoring. No recommendations or corrective action is required.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Facility Head - Detention Center Director</li> <li>· PREA Compliance Manager</li> </ul> <p>Provision (a):</p> <p>The Pre-Audit Questionnaire (PAQ) indicates GCDC does not house youthful inmates. In interviews with the Detention Center Director, it was confirmed GCDC does not house youthful inmates.</p> <p>During the on-site tour, the Auditor did not observe a youthful inmate. When looking over the inmate roster, there were no inmates with a birth year later than 2004.</p> <p>Provision (b):</p> <p>N/A</p> <p>Provision (c):</p> <p>N/A</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses youthful inmates. No recommendations or corrective action.</p>

**115.15**      **Limits to cross-gender viewing and searches**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018
- GCDC Sheriff Memorandum, 115.15 (b), undated
- GCDC Sheriff Memorandum, 115.15 (d), undated

Interviews:

- Facility Head - Detention Center Director
- PREA Compliance Manager

Provision (a):

The Pre-Audit Questionnaire (PAQ) indicates GCDC prohibits cross gender searches of inmates. In interviews with the Detention Center Director, it was confirmed GCDC prohibits cross gender searches.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 205.0, Searches, dated January 1, 2018, p. 2-3, B, 5 and 6, indicates GCDC staff are trained on cross gender search requirements mandated by state and applicable federal standards and same sex, opposite sex, cross gender, transgender and intersex inmate search requirements to include the prohibition of using searches for the sole purpose of determining sin inmate’s genital status.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 205.0, Searches, dated January 1, 2018, p. 3, D, states searches will never be used for the sole purpose of determining an inmate’s genital status.

During formal interviews and information conversations with staff, all of the staff recalled having the training specific to this and reported that cross gender strip searches or cross gender body cavity searches do not occur at this facility.

Provision (b):

GCDC Sheriff Memorandum, undated, states the GCDC Policy 205.0 states cross-gender strip searches, visual body cavity searches, and cross-gender pat-down searches of females are prohibited. With these actions being prohibited, there is no need for documentation policy.

During formal interviews and informational conversations with inmates, each inmate confirmed they had never been part of a cross gender search.

During formal interviews and informational conversations with staff, each staff member confirmed they had never been part of a cross gender search. When asked how the female staff would proceed if a male staff member was not available, they indicated there is always a male staff member on duty, who can be directed to the area to conduct the search. All staff recalled receiving training on opposite gender searches; however, each of them articulated that in all instances cross gender searches are not conducted at the facility. All staff (both male and female) reported cross gender strip searches or cross gender body cavity searches do not occur at this facility.

Provision (c):

The Pre-Audit Questionnaire (PAQ) indicates GCDC did not have any cross gender, pat down searches in the past 12-months. Policy prohibits cross-gender strip or visual body cavity searches are not permitted under any circumstances.

Random staff interviewed indicated there were sufficient male staff members available to conduct any searches that needed to occur, and that male staff would be diverted to address this issue if needed.

Provision (d):

GCDC Sheriff Memorandum, 115.15 (d), undated, documents there have been no exigent circumstances to document for cross-gender viewing of inmates showering, performing bodily functions or changing clothes.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 910.0, Supervision Rounds and Counts, dated January 1, 2018, p. 2-3, E, 1 and 2 states:

1. It is the policy of the detention center to allow inmates to shower, use the bathroom, and change clothing without non-medical staff of the opposite sex viewing their breasts, buttocks, or genitals. The only exception is in cases where exigent circumstances exist, e.g., emergency situations or when such viewing is incidental to conducting routine security rounds.
2. The detention center will implement practices that require officers of the opposite sex to announce his/her presence when entering an inmate housing unit. The failure of any officer making such a required announcement will result in disciplinary action, up to and including termination for repeat offenses.

On the PAQ, GCDC indicated they allowed inmates to shower, perform bodily functions and change clothes without staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when viewing is incidental to routine cell checks. Further the PAQ indicated opposite gender staff are required to announce their presence when entering an inmate housing unit.

During the facility tour, opposite gender staff were observed entering the housing units and announcements of their presence was made. The Auditor was also announced by GCDC staff when entering inmate housing and restroom areas as she was of opposite gender.

During formal interviews and information conversations with inmates all reported hearing opposite gender staff announce their presence when entering the housing unit. All staff interviewed reported that opposite gender staff announcements are made when entering the housing units.

Provision (e):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 205.0, Searches, dated January 1, 2018, p. 3, D, states searches will never be used for the sole purpose of determining an inmate's genital status.

During formal interviews and informational conversations with inmates, each inmate confirmed they had never been part of a cross-gender search.

During formal interviews and information conversations with staff, each staff member specifically stated that no searches would ever be permitted for the sole purpose of identifying an inmate's genital status.

Provision (f):

The Auditor reviewed copies of the 2021 PREA training sessions for GCDC staff. The Auditor verified each signature on the sign-in sheet correlated to an existing GCDC staff member listed on the staff roster, ensuring all staff received the required training. All participants also signed an acknowledgment of training materials. Training topics included appropriate search techniques, specifically cross-gender pat searches and searches of transgender and intersex inmates. Additional training documents provided direction to staff on proper documentation practices when cross gender searches were conducted.

When female staff were asked how they would proceed if a male staff member were not available, each indicated there was never an instance when male staff is not on duty and would be directed to the area to conduct the search to ensure cross gender searches are not performed. All staff interviewed recalled receiving training on opposite gender searches; however, each of them articulated that in all instances female staff do not conduct cross gender searches and will always defer to a male staff member to complete the search. During the facility tour, opposite gender staff were observed entering the housing units and announcements of their presence were made. The opposite gender Auditor was also announced by GCDC staff when entering the inmate housing and restroom areas.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses the limits to cross-gender viewing and searches. No recommendations or corrective action.

**115.16 Inmates with disabilities and inmates who are limited English proficient**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018
- GCDC Sheriff Memorandum, 115.16, undated

Interviews:

- Facility Head - Detention Center Director
- Random Staff
- Inmates with disabilities or LEP

Provision (a):

The Pre-Audit Questionnaire (PAQ) GCDC reported established procedures to provide disabled inmates and limited English proficient inmates with equal opportunity to participate in and benefit from all aspects of the agency's effort to prevent, detect and respond to sexual abuse and sexual harassment.

GCDC Sheriff Memorandum, 115.16, undated, states GCDC has no contracts with interpreters. We have 1 officer along with the in-house victim's advocate who can speak Spanish proficiently. Inmates who come in with limited reading skills have the information read to them by the Booking Officer.

The Auditor reviewed written documents, training materials, as well as PREA brochures, which are provided in both English and Spanish to the inmate population. Three LEP inmates were interviewed. Each inmate stated that materials were made available in their language and that staff interpreters were readily available to assist them when needed.

During the tour, the Auditor also observed the PREA posters were prominently displayed in each housing unit, work area, hallways, as well as numerous other areas throughout the facility in both English and Spanish.

During the interview with the Detention Director, it was revealed that GCDC has established procedures to provide inmates with disabilities or inmates who are Limited English Proficient (LEP), the opportunity to participate in PREA reporting process through several avenues such as staff interpreters and outside service providers as needed.

In the event a staff interpreter is not available the staff have the option of using the free service of Google Translate. Google translate can be accessed via a computer with an attached microphone to address any translation need for the inmates of the facility. At the present time, Google Translate supports 103 different languages, and is available 24 hours a day, 7 days a week.

The Auditor interviewed thirteen targeted inmates. Five were cognitively disabled; three were Limited English Proficient (LEP); one was physically disabled; and two were visually impaired. The three LEP inmates stated they received all PREA information and facility rules in English and Spanish. They further indicated language was not a barrier in programming or work assignments. The physically disabled inmate reported he felt safe and did not feel at a disadvantage due to his physical disability. The five cognitively disabled inmates indicated they had a clear understanding of the PREA guidelines and were each able to explain their rights and articulate multiple methods by which to report an issue if necessary. The two visually impaired inmates indicated they were provided materials they could read and if they had any questions, the staff read things to them. The gay inmate stated he did not feel like he was singled out and he was being treated fairly. The inmate who reported abuse reported he had been treated fairly, staff conducted their responsibilities, and he was notified of the outcome of the investigation.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 7, 4, states in part, the GCDC will provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, disabled, illiterate or learning disabled.

Provision (b):

The Auditor reviewed documentation that all GCDC staff had received PREA training, during the calendar year 2021. This training was extensive and comprehensive, instructing staff of the various components of Americans with Disabilities Act, including the appropriate treatment of those inmates who are covered under the act.

The Auditor reviewed the PREA Inmate Handout in English and Spanish. Inmate rules in English and Spanish. As well as posted PREA information in English and Spanish

Provision (c):

The Pre-Audit Questionnaire (PAQ) indicates GCDC prohibits the use of inmate interpreters in all circumstances.

Random staff interviewed indicated they were not aware of any time or situation that an inmate interpreter had been used.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses inmates with disabilities and inmates who are limited English proficient. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 707.0, Educational Programs, dated January 1, 2018

Interviews:

- Human Resources

Provision (a):

The Pre-Audit Questionnaire (PAQ) GCDC reported twenty-six staff, with twelve new hires, two contractors and zero volunteers.

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 707.0, Educational Programs, dated January 1, 2018, p. 1, C, indicates all educators under consideration to provide educational programming services on a full/part-time employment basis will be screened and selected consistent with Georgetown County hiring policies and procedures and all applicable state statutes and standards. In addition, educators selected to provide services to inmates will be subject to background screening consistent with related PREA standards and county hiring policies and procedures.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, 8, A, states the Georgetown County Detention Center will implement a hiring and promotion policy to assist in the prevention of sexual abuse at the detention center. At a minimum, hiring and promotional policies will be developed to prohibit the hiring or promotion of employee or of contractors who may have contact with inmates who have engaged in sexual abuse in a prison, jail, lock-up or other correctional confinement facility; have 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, of if the victim did not consent or was unable to consent or refuse; and/or have been civilly or administratively adjudicated to have engaged in any of the aforementioned activities.

The Auditor reviewed a random sampling of staff and contractor files. The auditor reviewed the staff records of the twelve new hires. Each of the records reviewed contained all items required by the standard, which included documentation and Criminal History Check information. The Auditor reviewed an additional fourteen staff records. The Auditor was able to verify all records reviewed contained all items required by the standard, including PREA documentation and verification of the completed criminal history checks.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, 8, B, states in addition, the Georgetown County Detention Center will consider any incident of sexual harassment in determining whether to hire or promote anyone or to contract with anyone who may have contact with inmates.

The Auditor interviewed Human Resource (HR) staff regarding the hiring practices of the GCDC. HR indicated that the potential hire is required to fill out the personnel documents, which require the disclosure of the standard required items. HR stated that GCDC takes a continually active stance with the requirements of the PREA standards and have developed a system of tracking to ensure that all the required history checks are completed for pre-hires, promotions, and five-year reviews. The Auditor conducted a review of the requested personnel records and verified that all the records contained all items required by the standard, including the PREA documentation and verification of the completed criminal history checks. The three questions listed under Provision (a) were asked and answered on all documents as required by the standard.

Provision (c):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape

Elimination Act, effective January 1, 2018, p. 9, 8, C, states before hiring new employees who may have contact with inmates, the hiring official will ensure a criminal background records check is conducted of the prospective employee and will make his/her best effort (consistent with all applicable laws) to contact prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Those responsible for hiring or promoting any individual will maintain documentation that required background checks and investigations have been completed. Criminal background checks will be completed every two (2) years as required by SLED/NCIC.

In the preceding twelve-months there were twelve persons hired who may have contact with inmates who had a criminal background check completed. The Auditor conducted a review of the new hires personnel records and verified that all of the files contained all items required by the standard, including the PREA documentation and verification of the completed criminal history checks.

Provision (d):

On the PAQ, GCDC reported there are a total of two contractors who might have contact with inmates. GCDC conducts background checks on each contractor prior to them having contact with an inmate and every five years thereafter. GCDC provided information for review indicating 100% of the contractors had up to date with criminal background history checks.

Provision (e):

GCDC conducts a criminal background records check, upon application, when being considered for a promotion, and every five years on all current employees and contractors. The HR staff confirmed this information during the interview process.

Provision (f):

During the interview with the HR, it was reported all applicants and employees who may have contact with inmates are directly asked about previous misconduct described in paragraph (a) of this section in written applications and self-evaluations or interviews for hiring or promotions.

During the interview with the HR, it was reported that a condition of staff employment is that any arrest activity must be reported through the respective employees reporting structure. Additionally, any information on substantiated allegations of sexual abuse or sexual harassment involving a former employee must be provided upon request.

Provision (g):

During the interview, the HR confirmed material omissions regarding misconduct of this nature, or the provision of materially false information, shall be grounds for termination.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 10, E, states any Georgetown County Detention Center hiring authority reserves the right to ask any applicant and employee who may have contact with inmates directly about previous conduct described in Specific Procedure #8.A., above, in written applications or interviews for hiring or promotion or in any interviews or written self-evaluations conducted as part of an employee's or contractor's annual review. Should any employee, applicant or contractor provide false information or omit information regarding their involvement in any conduct described in Specific Procedure #8.A., above, they will be subject to immediate disciplinary action up to and including immediate termination. Those responsible for hiring, promoting or reviewing employees, contractors or applicants will ensure documentation is maintained regarding any disciplinary action taken in these cases.

Provision (h):

During the interview, the HR confirmed that unless prohibited by law, all information would be provided on substantiated allegations of sexual abuse or sexual harassment involving a former employee would be shared upon request from an institutional employer for whom such employee has applied for work.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses hiring and promotion decisions. No recommendations or corrective action.



<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Facility Head - Detention Center Director</li> </ul> <p>Provision (a):</p> <p>On the PAQ, GCDC reported the agency/facility has not acquired new facilities or made substantial expansions or modifications of existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>On the PAQ, GCDC reported the agency/facility has 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. The schematic with cameras verifies this update.</p> <p>The Auditor interviewed the Detention Center Director who reported any construction, renovation or modification would be done with full consideration of all PREA standards. He further reported there are meetings that would be held regarding any building or construction considerations and that safety and cameras, or other technologies would be discussed and considered at such meetings. During these meetings WSU executive staff would meet with all key supervisors and managers to discuss any pertinent issues, such as Data/Reporting issues, Grievances, Disciplinary Reviews, Video Summary Reviews, Use of Force Incidents, Incidents of Sexual Abuse, as well as the analysis of key data such as overtime, leave time, morale, etc.</p> <p>Provision (b):</p> <p>During the interview with the Detention Center Director, he stated there was ample camera coverage throughout the facility, which is complimented by security mirrors for extra security. During the facility tour the auditor observed the cameras and security mirrors.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses upgrades to facility and technology. No recommendations or corrective action.</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018</li> <li>· Sheriff Memorandum, 115.21c, undated</li> <li>· MOU between GCDC and Rape Crisis Center</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· SAFE/SANE Staff</li> <li>· Random Staff</li> <li>· PREA Compliance Manager (PCM)</li> </ul> <p>Provision (a):</p> <p>On the PAQ, GCDC reported the facility is responsible for conducting administrative investigation within the facility. Additionally, the PAQ reflects, the agency, Georgetown County Sheriff's Department, is responsible for conducting all criminal investigations. Further the PAQ states that no outside agency is used for investigative purposes.</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 15, E, 2, states the supervisor will direct the scene to be secured to preserve any evidence and immediately contact (or request another officer to contact) a trained investigator(s) to process the scene consistent with Sheriff's Office regulations and with the investigative requirements contained in PREA Standards. At a minimum, Sheriff's Office investigators assigned to conduct PREA investigations will receive specialized training in the following areas:</p> <ol style="list-style-type: none"> <li>a. Interviewing sexual abuse victims and perpetrators in confinement settings;</li> <li>b. Proper use of Miranda and Garrity warnings during such investigations;</li> <li>c. Sexual abuse evidence collection in confinement settings, to include the criteria and evidence required to substantiate a case for administrative action and/or criminal prosecution</li> </ol> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 3, states specialized training will be provided for employees who may respond, as part of their duties, to reported incidents of sexual abuse. This training may include, but will not be limited to crime scene management in a confinement facility; elimination of contamination in accordance with blood borne pathogen exposure control programs; evidence collection protocol; and crisis intervention. Employees responsible for criminal investigations related to reports of inmate sexual abuse will receive documented training on conducting investigations in confinement facilities as required under PREA Standards.</p> <p>The Auditor interviewed random staff regarding the rules of evidence, and their understanding of the process should an inmate report alleged sexual abuse. All staff interviewed were able to articulate the basic preservation of evidence component of both victim and abuser. They were also able to explain their responsibilities up to the point when they transfer responsibility to either investigative or medical staff.</p> <p>Provision (b):</p> <p>According to the PAQ, GCDC does not house youthful offenders.</p> <p>Provision (c):</p> <p>On the PAQ, GCDC reported all treatment services are provided to the victim without financial cost. Further, the PAQ reports</p>

that all forensic examinations are completed at Tideland Health Georgetown Memorial Hospital emergency department. The ER staff have specialized training to complete a forensic examination but does not require that be SANE or SAFE training. When possible SAFE or SANE will be utilized.

SAFE/SANE personnel reported the forensic program is responsible for conducting all forensic medical examinations for the facility. SANE personnel are available 24/7/365; however, if unforeseen circumstances arise and SANE personnel cannot perform the exam, an ER physician and ER registered nurse with a minimum of two hours of forensic evidence collection training may perform the exam. The exam starts with explanation of the exam and written consent from the patient. From there the SANE will gather demographic information and past medical and surgical history. Details of the assault will be documented in the patient's words in the forensic medical record. After all information is obtained, the SANE will do a head-to-toe assessment, document trauma, and take photographs with the patient's consent. A detailed genital exam will be done with the use of high-resolution digital imaging with the patient's consent. Forensic evidence is collected in conjunction with the head-to-toe assessment and genital assessment. Evidence is packaged and secured while maintaining chain of custody until it can be released to law enforcement. After the exam, the SANE will discuss prophylaxis medication to prevent sexually transmitted infections, including HIV. If the patient is female, the SANE will also discuss emergency contraception options.

Sheriff Memorandum, 115.21c, undated, states in the event that a SANE/SAFE evaluation would be required for a PREA incident, the Georgetown County Detention Center would provide transportation to Tideland Health Georgetown Memorial Hospital Emergency Department where certified practitioners are available for the procedure. Our in-house Medical Department does not handle these procedures.

There have been no incidents in the past twelve months that have required SANE/SAFE procedures.

The SAFE/SANE representative confirmed the examinations are provided at no cost to the inmate and that all forensic services are provided when the inmate alleges sexual abuse, sexual assault, or sexual battery.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, B, states the GCDC will make every effort to enter into contracts with outside agencies trained to assess and provide counseling services for sexual abuse victims or will document that such services are available in-house by qualified staff through the contract health care provider. At a minimum, these services will include: 1). Mental health crisis intervention and treatment; 2). Social, family, and peer support; and 3). Medical treatment, including testing for HIV and other sexually transmitted diseases, emergency contraceptive and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. All treatment services will be provided without cost to the victim, regardless of whether the victim names the perpetrator or cooperates with an investigation into the alleged sexual abuse. To the extent possible, all services provided will be consistent with the community level of care.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 15, E, 4, states health care providers responsible for the initial care of the inmate will assess the medical and mental health care needs of the victimized inmate. If the incident involved sexual abuse that occurred within a 72-hour period, the inmate will be offered a sexual abuse medical examination. Sexual abuse medical examinations will be conducted by an outside medical facility contracted to conduct sexual examinations utilizing Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).

Provision (d):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, C, states a victimized inmate may at any time request a victim advocate or other qualified staff member or contracted organization to accompany him/her through the forensic medical examination process or investigatory interview process. Victim advocates, the inmate may also request qualified staff members or approved organizations to provide emotional support, crisis intervention, information and referrals.

The MOU between GCDC and the Rape Crisis Center documents the facility has made victim advocates available to the inmates who experience sexual abuse or sexual harassment.

There is one employee of the Georgetown County Detention Center who can serve as a victim's advocate. If she is unavailable there are two more victim's advocates that are available.

Provision (e):

As stated in Provision (d) during the examination, the inmate meets the victim advocate. The victim advocate provides emotional support, crisis intervention, information, and referrals as necessary and/or requested.

The MOU between GCDC and the Rape Crisis Center documents the facility has made victim advocates available to the inmates who experience sexual abuse or sexual harassment.

Provision (f):

According to the PAQ, GCDC has facility staff conduct administrative investigations and agency staff conduct criminal investigations.

Provision (g):

Auditor is not required to audit this provision.

Provision (h):

As stated in Provision (d) victim advocacy services are offered through the Rape Crisis Center or a GCDC staff member.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses evidence protocol and forensic medical examinations. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Investigative Staff
- Random Staff

Provision (a):

On the PAQ, GCDC reported the facility is responsible for conducting administrative investigation within the facility. Additionally, the PAQ reflects, the agency, Georgetown County Sheriff's Department, is responsible for conducting all criminal investigations. Further the PAQ states that no outside agency is used for investigative purposes.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, A, explains upon receipt of a completed Incident Report or notification of an allegation of sexual abuse, the supervisor (or other higher level employee if the subject of the complaint was a shift supervisor) will immediately contact and forward the Report to the PREA Coordinator so that an administrative or criminal investigation can be initiated. Trained investigators from the Georgetown County Sheriff's Office will be utilized to conduct all criminal investigations. The PREA Coordinator will head all administrative investigations. (NOTE: Depending on the severity of the alleged sexual abuse report, the Detention Center Director may opt to have the South Carolina Law Enforcement Division (SLED) conduct the investigation.)

Information received regarding the allegations of sexual abuse indicate in the past twelve-months there had been a total of three allegations made. Of those three, two were inmate-on-inmate. One inmate-on-inmate was deemed unsubstantiated for lack of evidence. The other inmate-on-inmate was investigated criminally and deemed substantiated after investigation. In this case a warrant was issued for the perpetrator for Assault and Battery 2nd Degree. The inmate appeared before a Magistrate and bond was set at \$5,000 and could be paid upon release from the current sentence. The remaining one was staff-on-inmate. This was determined to be unfounded after the victim recanted and said nothing had happened. In this case the victim was disciplined for filing a false report.

There were zero forensic examinations in the past twelve months.

All staff interviewed knew their responsibility to report any suspicion, or knowledge of an allegation of sexual abuse and sexual harassment. Each reported they were required to make such a report immediately after becoming aware of it. They further stated they are to immediately report to their shift supervisor.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, B, states all allegations of sexual abuse and harassment will be investigated promptly and objectively and generally will be initiated by the end of the shift.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, C, states the release or transfer of the alleged victim(s) or perpetrator(s), or the termination, suspension or voluntary departure of an employee(s) involved in the incident, will not be grounds to terminate any investigation. The Georgetown County Detention Center will uphold a policy that no employee, contractor or volunteer lessen to any degree the credibility of any victim, witness or suspect because of the person's status as an inmate or detainee. No member of the detention center staff will boost the credibility of any witness or suspect because the individual is a detention center employee, contractor or volunteer.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 15, 10, states the Detention Center Director/designee will ensure that investigative protocols for allegations of sexual abuse and harassment are included on their website. Minimally, the information to be included on the website will include information that specifies that Georgetown County Sheriff's Office investigators are responsible for conducting PREA criminal investigations.

During interviews, staff indicated all allegations are investigated. If the allegation seems to be criminal in nature, the Georgetown County Sheriff's Office complete the investigation. If the allegation can be handled administratively, the investigation is conducted by the GCDC staff.

Provision (c):

On the PAQ, GCDC reported all administrative investigations are completed by GCDC facility staff. All criminal investigations are completed by the Georgetown County Sheriff's Department. If evidence supports criminal prosecution, prosecution is pursued. If not, it is kicked back to the facility for administrative procedures.

Provision (d):

Auditor is not required to audit this provision

Provision (e):

Auditor is not required to audit this provision

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies to ensure referral of allegations for investigations. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018

Observations during on-site review

Interviews:

- Random Staff

Provision (a):

On the PAQ, GCDC reported all staff and contractors who have contact with inmates are provided PREA training. The training provided to contractors by the facility is specific to the services provided and the level of contact with offenders. All staff and contractors are trained in the zero-tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures for reporting incidents.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018, p. 1, 1, indicates the Detention Center Administrator will designate a staff member to serve as the detention center's Training Officer. The Training Officer will be responsible for ensuring that detention center staff are scheduled for and receive training in compliance with applicable South Carolina Minimum Jail Standards; Prison Rape Elimination Act (PREA) standards; and with the requirements set forth by the South Carolina Criminal Justice Academy.

GCDC's curriculum and training materials were reviewed by the Auditor. The core training materials contain all ten (10) of the elements required for this provision. Each of the elements is covered in detail in the training and have incorporated numbered training elements in order to facilitate retention of the required elements. The level or complexity of the training will depend on the employee's classification with some specialized training curriculum depending on the employee's job responsibilities.

The Auditor reviewed staff training records, conducted on staff from various categories. Each reviewed file contained all relevant documentation to reflect the staff had met their initial PREA requirements. In addition, the Auditor also reviewed all the sign-in sheets for PREA refresher training for the past twelve months which confirmed by staff signatures, each of the employees at WSU had acknowledged receiving the PREA training.

Each of the staff interviewed recalled attending the initial PREA training when they were hired or when PREA went into effect. All staff interviewed confirmed they receive annual, in-service PREA training, as well as additional shift turnout training.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018, p. 1, 2, indicates all training received by employees will be documented and forwarded to the Training Officer/designee for record keeping and documentation purposes. Training records related to PREA training will be made available to the detention center's PREA Coordinator, upon request.

The training provided by the GCDC, addresses both male and female issues. The Auditor reviewed the training materials utilized for the staff at GCDC. The training materials are consistent with this PREA standard. If an employee is reassigned from a facility that houses a different population composition, that employee is retrained or provided refresher training for the population make-up of the new facility prior to be placed in contact with the inmate population. The training curriculum did include training specific to transgender inmates.

As stated in Provision (a), the Auditor reviewed documentation for the training that occurred at GCDC, verifying attendance of GCDC staff.

Provision (c):

Of the staff presently assigned to GCDC, the Auditor reviewed documentation that reflected all staff have received PREA training in the past twelve months. GCDC staff also receive refresher training every two years. The Auditor reviewed documents of the last refresher training in fiscal year 2021. The annual PREA training was conducted in the fiscal year 2020. GCDC also provides additional PREA training annually, as well as shift trainings, staff meetings, educational materials, and posters.

Provision (d):

PREA training requirements mandate attendance at all PREA required training to be documented through employee signature, acknowledging the training they have received. In some instances, employees are required to complete an Acknowledgement of Receipt of Training upon completion of the training. Copies of these receipts were observed in every file reviewed by the Auditor. The receipts contained various dates which reflected separate training sessions.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses employee training. No recommendations or corrective action.



**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Contractors

Provision (a):

On the PAQ, GCDC reported all contractors who have contact with inmates are provided PREA training. The training provided to contractors by the facility is specific to the services provided and the level of contact with offenders. All contractors are trained in the zero-tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures for reporting incidents. GCDC reports zero volunteers.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 2, states in part, contractors who have contact with inmates will receive training on their responsibilities under the detention center's PREA policies. The PREA Coordinator and/or Training Officer will ensure that this training is scheduled for all contractors at the time of their initial services. All training will be documented and will include an acknowledgement that the contractor understood the training. Documentation will be maintained by the Training Officer and will be made accessible to the PREA Coordinator, upon request.

GCDC's curriculum and training materials for volunteers and contractors were reviewed by the Auditor. The core training materials contain all key elements required for this provision. Each of the elements is covered in detail in the training and have incorporated numbered training elements in order to facilitate retention of the required elements. The level or complexity of the training will depend on the contractors' responsibilities.

The Auditor reviewed three contractor training records. Each reviewed record contained all relevant documentation to reflect the contractor had met their initial PREA requirements.

The Auditor conducted three formal interviews with a contract staff member, all from food service. The contractors recalled having PREA training, stating it was specific to their roles or responsibilities in the facility. When the Auditor questioned them about their knowledge of PREA, they were able to identify what PREA was and more importantly, what their role or responsibility would be in the event they were confronted with a situation of Sexual Abuse or Sexual Harassment.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 2, states in part, contractors who have contact with inmates will receive training on their responsibilities under the detention center's PREA policies. However, all contractors shall at a minimum be trained in zero tolerance and how to report sexual abuse or sexual harassment.

The Auditor conducted three formal interviews with contract staff. During the interviews, the contractors demonstrated to the Auditor a comprehensive and complete understanding of the agency's zero-tolerance policy and how to address any instance when an inmate reports a PREA specific issue.

Provision (c):

As indicated in Provision (b) copies of the acknowledgment page from the PREA training is retained in each contractor file. The Auditor reviewed the training acknowledgments from the PREA training sessions for the past twelve months. Each sign in sheet reflected acknowledgment signatures from contractors for the PREA training they received.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding volunteer and contractor training. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 707.0, Educational Programs, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018
- PREA Posters
- Miscellaneous Training Materials

Observations during on-site review

Interviews:

- Intake Staff
- Random Inmates

Provision (a):

On the PAQ, GCDC reported 2,056 inmates were admitted during the past twelve months and 100% were given PREA information at intake.

GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018, p. 1, 1, A, states the Detention Center Director will be responsible for ensuring that an inmate guide and PREA informational brochure are developed and made accessible to all inmates upon their admission to the detention center

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 2, D, 2, states the PREA Pamphlet : At a minimum , the pamphlet should provide inmates with the following information: a. Incident reporting procedures; b. Victim services, to include medical and mental health care services; c. Investigative process (an overview); d. Pre-screening for classification; e. Detention center's zero tolerance policy against any form of sexual abuse and harassment.

The Inmate Handbook, as well as the PREA Posters were observed during the on-site tour of the facility by the Auditor. The Auditor reviewed written materials in both English and Spanish.

During interviews with intake staff, it was confirmed all inmates who enter the care and custody of the GCDC are provided an Inmate Handbook and PREA Pamphlet upon admission. The inmate signs the acknowledgment form which is retained in the inmate record.

During the inmate interviews, all of them remembered receiving written PREA materials and an Inmate Handbook. All the interviewees reported the material they received included information about the facility's zero tolerance policy and ways to report.

Provision (b):

Per the PAQ, GCDC reported during the past twelve months there were 240 inmates whose length of stay at the facility was more than thirty days. The PAQ also reflected these inmates were provided the PREA information which included their right to be free from sexual abuse, as well as the policies and procedures for reporting. GCDC reported 100% of the inmates admitted to their facility in the past twelve months received the mandated information.

During interviews with intake staff, they indicated inmates receive their PREA training immediately upon arrival, prior to their unit assignment

During interviews with inmates, each were asked to briefly outline what they learned during PREA training. All responses were similar in nature and were generally: zero tolerance for sexual abuse or harassment, right to be free from sexual harassment and retaliation for reporting, who to talk to about a concern, who to report an incident to, and call the number on the posters around the facility.

Provision (c):

As indicated in Provision (b) 100% of inmates who entered the facility during the past twelve-month period received the required PREA training. This training, at intake, is facilitated through staff going over material and answering any questions the inmate may have. Upon arrival, the inmate is given PREA information and is provided an Inmate Handbook and goes through the A&O process. At the end of the A&O process is a question-and-answer period to reinforce retention of the information presented. The information was documented with verification of the training retained in the inmate institutional record.

As indicated in Provision (b) the intake staff provide the PREA information immediately upon arrival into the facility. Interviews with intake staff revealed that upon arrival at the facility inmates are given orientation materials, including PREA related materials, before being assigned to a housing unit. This is a requirement for all inmates, whether they are a new intake or a transfer from another facility.

Provision (d):

GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018, p. 2, A, states inmates will be provided orientation training on a schedule to be developed by the Assistant Director/designee. At a minimum, orientation will take place within 30 days of an inmate's initial admission to the detention center.

GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018, p. 2, B, states Any lesson plans, training outlines, videos, and any other related training literature related to basic inmate orientation will be approved by the Detention Center Director or his/her assigned designee prior to delivery. The PREA Coordinator will be responsible for approving all PREA related training provided inmates

As a back-up, anytime a translation service is needed and in the unlikely event an interpreter is not available, the staff can use Google Translate. Google translate can be accessed via a computer with an attached microphone to address any translation needs for the inmates of the facility. At the present time, Google Translate supports 103 different languages, and is available 24 hours a day, 7 days a week.

During the interview with the PCM, she was asked what the process was if an inmate had a disability not covered under the training elements established by the facility. She stated they would work with the Local Disability Assistance to ensure each inmate is able to understand and retain the PREA materials to a comfort level of comprehension.

Provision (e):

As stated in previous provisions, all inmates sign a receipt of the Inmate Handbook, as well as for receipt of the PREA pamphlet. The originals of these forms are maintained as documentation.

A review of inmate records was conducted, and the signed acknowledgment document was in every file.

Provision (f):

It is evident GCDC has put measures in place to ensure the inmates at GCDC receive crucial education about sexual abuse and sexual harassment. Using varying formats, the inmate population receives important information in user friendly, comprehensible ways. The Inmate Handbook is an excellent tool which specifically lays out the prevention of sexual violence, zero tolerance policy and includes multiple methods inmates can seek assistance regarding sexual violence.

GCDC has a variety of PREA posters, in both English and Spanish. These posters are different throughout the facility as not to become easy to overlook. During the on-site, the Auditor observed these posters and paintings in every room throughout the facility.

In interviews with inmates, they each reported the PCM, as well as other staff, check with them formally and informally about PREA issues and practices. They often ask their safety and vulnerability factors.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding inmate education. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- Sheriff Memorandum, PREA 115.34a, undated

Interviews:

- Facility Head – Director of Detention
- Investigative Staff

Provision (a):

The PAQ reflects the GCDC has 2 investigators. The Auditor reviewed sign-in sheets confirming the required training was successfully completed.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 3, states specialized training will be provided for employees who may respond, as part of their duties, to reported incidents of sexual abuse. This training may include, but will not be limited to: crime scene management in a confinement facility; elimination of contamination in accordance with blood borne pathogen exposure control programs; evidence collection protocol; and crisis intervention. Employees responsible for criminal investigations related to reports of inmate sexual abuse will receive documented training on conducting investigations in confinement facilities as required under PREA Standards.

The Auditor reviewed sign-in sheets and training materials that reflect the general PREA training that is mandated for GCDC employees, contractors and volunteers outlined in policy and PREA standards. The sign-in sheets confirm, in addition to specialized training, the investigators received the general PREA training mandated for all GCDC employees.

PREA Training Test Results, confirmed all investigators completed the required training and passed the curriculum post-test.

Currently there are two investigators. Through staff interview and review of training documents by the Auditor, each of the assigned investigators have attended the required training and meet all training requirements.

Through a review of training records and an interview with the GCDC investigator, the Auditor was able to confirm that all training requirements have been met.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 15, E, 2, states the supervisor will direct the scene to be secured to reserve any evidence and immediately contact (or request another officer to contact) a trained investigator(s) to process the scene consistent with Sheriff's Office regulations and with the investigative requirements contained in PREA Standards. At a minimum, Sheriff's Office investigators assigned to conduct PREA investigations will receive specialized training in the following areas:

- a. Interviewing sexual abuse victims and perpetrators in confinement settings;
- b. Proper use of Miranda and Garrity warnings during such investigations;
- c. Sexual abuse evidence collection in confinement settings, to include the criteria and evidence required to substantiate a case for administrative action and/or criminal prosecution.

Provision (c):

Sheriff Memorandum, PREA 115.34a, undated, says specialized training for investigators curriculum from PREA Resource Center website:

<https://www.prearesourcecenter.org/ec-item/1910/specialized-training-investigating-sexual-abuse-in-confinement-settings>

Provision (d):

The auditor does not have to audit this provision.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding specialized training: investigations. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 105.0, Employee Training Requirements/Training Records, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 400: Medical and Mental Health Policy 400.0, Inmate Health Services, effective January 1, 2018

Observations during on-site review

Interviews:

- Medical and Mental Health Staff

Provision (a):

GCDC Policies and Procedures, Chapter 400: medical and Mental Health Policy 400.0, Inmate Health Services, effective January 1, 2018, p. 3, 5, A, states consistent with PREA standards, all contract health care providers will agree to participate in PREA training as a condition of their contract. This includes all full- and part-time health care providers, as well as any other sub-contracted health care workers and volunteers with contact with inmates utilized by the contract health care provider.

A review of the provided lesson plan/training materials demonstrate compliance with this training requirement:

- a. How to detect and assess signs of sexual abuse and sexual harassment;
- b. How to preserve physical evidence of sexual abuse;
- c. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
- d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Through staff interview and a review of training documents by the Auditor, each of the medical and mental health care practitioner have attended the required training and meet all training requirements.

Through a review of training records and an interview with the GCDC Director, medical and mental health care practitioners, the Auditor was able to confirm that all training requirements have been met.

Currently there are one hundred medical and mental health staff assigned to the facility. Through staff interview and review of training documents by the Auditor, each of the assigned staff members have attended the required training and meet all training requirements.

Provision (b):

GCDC Policies and Procedures, Chapter 400: medical and Mental Health Policy 400.0, Inmate Health Services, effective January 1, 2018, p. 3, 5, B, states at a minimum, training will be designed to cover the following topics and will be resented to contract health care providers by either the Georgetown County Detention Center PREA Coordinator OR by the health care provider organization. Training for recently hired contract providers should be completed prior to their assignment at the facility as orientation training; training for existing providers should take place within one year of the implementation of the PREA Standards. At a minimum, training will consist of the following:

1. How to detect and assess the signs of sexual abuse and sexual harassment;
2. How to preserve physical evidence of sexual abuse;
3. How to respond to victims of sexual abuse and harassment;
4. How and to whom to report allegations or suspicions of sexual abuse and/or harassment;

5. What the roles and responsibilities of the health care provider are should an inmate report that he/she is or has been a victim of sexual abuse as outlined in Policy 108.0 - PREA/Zero Tolerance; and

6. Review of the detention center's PREA procedures as outlined in Policy 108.0 -PREA/Zero Tolerance

All medical staff at GCDC are prohibited by procedure from performing forensic examination on sexual abuse victims.

Provision (c):

GCDC Policies and Procedures, Chapter 400: medical and Mental Health Policy 400.0, Inmate Health Services, effective January 1, 2018, p. 3, 5, C, states all training provided to contact health care workers will be documented and maintained as outlined in Policy 105.0 - Employee Training Requirements and will be made accessible to the PREA Coordinator, upon request.

As indicated in Provision (a), through staff interview and a review of the training documents by the Auditor, each of the assigned staff members have attended the required training and meet all training requirements. All training documentation is retained in the employee file, as required.

Provision (d):

The Auditor reviewed sign-in sheets and training materials that reflect the general PREA training that is mandated for GCDC employees, contractors and volunteers outlined in policy and PREA standards. The sign-in sheets confirm, in addition to specialized training, the contracted and direct hire medical staff received the general PREA training mandated for all GCDC employees.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding specialized training: medical and mental health care. No recommendations or corrective action.

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018</li> <li>· Inmate Records</li> </ul> <p>Observations during on-site review</p> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Staff Responsible for Risk Screening</li> <li>· PREA Compliance Manager (PCM)</li> <li>· Inmates</li> </ul> <p>Provision (a):</p> <p>GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 2, states the PREA Coordinator, in consultation with identified staff, will ensure that intake screening required under the PREA standards is incorporated into their intake and classification processes to assess an inmate's perceived risk of being a victim or perpetrator of sexual abuse. At a minimum, the assessment will consider the following information: 1). Whether the inmate has a mental, physical or developmental disability; 2). The age of the inmate; 3). The physical build of the inmate; 4). Whether the inmate has previously been incarcerated; Whether the inmate's criminal history has been nonviolent; 6). Whether the inmate has prior convictions for sex offenses against an adult(s) or a child(ren) ; 7). Whether the inmate is or perceived to be gay, bi-sexual, transgender, intersex or gender nonconforming; 8). Whether the inmate has previously experienced sexual victimization; 9). Whether the inmate is detained solely for civil immigration purposes; 10). The inmate's own perception of vulnerability.</p> <p>GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018, p. 2, E, to ensure conformity with these procedures, the booking supervisor will be responsible for reviewing the documentation presented for all new admissions during their shift to ensure the appropriate legal authority exists to detain any individual in the detention center. Any discrepancies will be rectified with the appropriate booking officer or will be brought to the attention of the booking supervisor for corrective action, if appropriate.</p> <p>Of the random and targeted inmates interviewed relative to this all were able to recall being asked questions relative to their concern for sexual safety, and if they felt like they were going to harm themselves.</p> <p>During the on-site audit, the Auditor was able to ask questions about the intake process.</p> <p>Provision (b):</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 8, states consistent with PREA Standards 115.41(a) - (i), the Georgetown County Detention Center will assess all inmates during intake for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Intake screening will take place within 72 hours of an inmate's admission to the facility by medical staff. An objective screening tool will be developed and approved by the Director and the PREA Coordinator to be used for this purpose. (See, also Policy 204.0 – Intake Screening for Risk of Victimization/Abuse, for more information.)</p> <p>As stated in (a), according to the listed policies all inmates must be screened within 72 hours of arrival.</p> <p>The Auditor reviewed the PAQ which indicated in the past twelve months, 100% of 578 inmates were screened for the risk of</p>



sexual victimization or sexual abusiveness within 72 hours of their entry into the facility.

A list of inmates' arrival dates and dates of evaluation demonstrate compliance with this standard. From the roster of inmates, the Auditor chose files of inmates to review. The files were for inmates from varying housing units, ethnic and racial backgrounds. The names were chosen from a complete alpha roster of inmates. The Auditor went down the list and randomly chose names, in no order or sequence, from the roster.

The Auditor reviewed inmate files to ensure they received the training and how that training was completed. All files had verification that the initial screening had occurred within 72-hours of arrival at GCDC.

Of the random and targeted inmates interviewed, all recalled being asked questions specific to previous sexual abuse & harassment within three days of their arrival at the facility. Each inmate indicated that it occurred the day of their arrival.

During the interview, classification staff reported all of the PREA related questions are asked during initial intake and ongoing classification screenings.

Provision (c):

Inmates who surpass the threshold on the screening form are referred to Mental Health for an additional assessment regarding their level of risk, environmental considerations, and treatment needs. The inmate is reassessed within thirty days, after the initial meeting.

The Auditor was able to verify compliance with this provision through the review inmate records, reflecting copies of the required assessments. A review of the screening instrument proved it is weighted and scored based upon responses to specific questions required in the Standard and Provision.

Provision (d):

All items required for Provision (d) have been included on the screening instruments. The included items are:

- What is the inmate's sexual orientation
- What is the inmate's gender identity
- Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming
- Whether the inmate has been a victim of sexual abuse while incarcerated, as an adult or juvenile
- Whether the inmate been a perpetrator of sexual abuse while incarcerated, as an adult or juvenile
- Whether the inmate has been a victim of sexual abuse anytime in the life outside of being incarcerated
- Whether the inmate has been a perpetrator of sexual abuse anytime in the life outside of being incarcerated
- Whether the inmate feels adequately familiar with the prison environment
- Whether the inmate is being approached or pressured by other inmates for sexual favors
- Whether the inmate was previously incarcerated
- Whether the inmate's criminal history is exclusively nonviolent
- Whether the inmate has prior convictions for sex offenses against an adult or child
- Whether the inmate has previously experienced sexual victimization
- The inmate's own perception of vulnerability.
- Whether the assessor notices or has knowledge of anything the inmate is not reporting

As stated in (a), the Auditor was able to review the intake process.

Provision (e):

As stated in (a), the Auditor was able to review the intake process and interview classification staff who were able to explain the classification process.

Provision (f):

The Auditor reviewed the PAQ which indicated that within the past 12 months of the inmates in the facility longer than thirty-

days, 240 inmates were re-assessed for the risk of sexual victimization or risk of sexually abusiveness of other inmates within thirty-days of their entry into the facility.

Of the random and targeted inmates, who arrived after PREA went into effect, everyone indicated they recalled being asked questions relative to this standard. Most indicated they recalled being interviewed within a couple of weeks after arrival. A review of the inmate files confirmed they had been reassessed within the thirty-day timeframe.

Out of the inmate records which were reviewed by the auditor, all had been reassessed within thirty days. Different staff completed these finished screening documents, with each instrument being finalized consistent with the standard.

Provision (g):

Classification staff indicated they monitor the inmate population, and will re-assess when warranted due to a referral, request, incident of sexual abuse or receipt of additional information that may have bearing on the inmate's risk of victimization or abusiveness.

Provision (h):

Classification staff as well as the PCM, indicated they do not discipline any inmate for their refusal to answer these questions during an assessment, rather each of them indicated they would explain the reason behind the question and attempt to solicit a response. However, no disciplinary action would be taken if the inmate chose not to respond.

Provision (i):

As stated in (a), the Auditor interviewed classification staff. During the interview process, the classification staff indicated access to the inmate's classification information is secured, with controlled access by classification staff.

The Auditor interviewed the PCM regarding who can specifically access the screening information collected during intake and screenings, and was informed that Medical Staff, Mental Health Staff, Classification Staff and the PCM have access. All information is limited to a need-to-know basis for staff, only for the purpose of treatment and security and management decisions, such as housing and cell assignments, as well as work, education, and programming assignments.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding Screening for Risk of Sexual .Victimization and Abusiveness. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 300: Classification Policy 300.0, Inmate Classification/Reclassification, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 300: Classification Policy 301.0, Administrative Separation (Special Management, Protective Custody, Medical/Mental health Observation), dated January 1, 2018
- Inmate Records

Observations during on-site review

Interviews:

- Staff Responsible for Risk Screening
- PREA Compliance Manager (PCM)
- LGBTI Inmates

Provision (a):

GCDC Policies and Procedures, Chapter 300: Classification Policy 300.0, Inmate Classification/Reclassification, dated January 1, 2018, p. 1, defines classification as an objective process of identifying and categorizing various offender traits, characteristics, and potential risks so as to house inmates in a safe, humane manner. Proper classification ensures secure detention center operations and facilitates staff, inmate and public safety. It also allows inmates to be assigned to programs and services that constructively occupy their time in custody, thereby facilitating the orderly management of the detention center.

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 2, 2, A, states within 72 hours of the inmate's arrival to the detention center, booking officers will complete initial screening of the new admissions and will capture the information included in Procedure #1, above. A copy of the completed form will be saved in the inmate's record and another will be forwarded to the detention center's classification officer.

The PCM indicated every assessment completed by staff is factored into the placement and programming of each inmate. She further stated the inmate's risk levels, housing and program assignments are guided with the use of these various assessments ensuring that every inmate, especially those at high risk of being sexually victimized, are separated from those at high risk of being sexually abusive.

Following a review of inmate records, the Auditor was able to verify that the information from these assessments was being utilized in the various classification decisions made by staff.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 8, states consistent with PREA Standards 115.41(a) - (i), the Georgetown County Detention Center will assess all inmates during intake for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Intake screening will take place within 72 hours of an inmate's admission to the facility by medical staff. An objective screening tool will be developed and approved by the Director and the PREA Coordinator to be used for this purpose. (See, also Policy 204.0 – Intake Screening for Risk of Victimization/Abuse, for more

information.)

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 2, 2, C, states consistent with the procedures outlined in Policy 300.0 – Initial Classification and Reclassification, this information, along with other classification information obtained during the booking process, will be used by the classification officer to inform decisions regarding an inmate's initial housing, program, and work assignments, etc. in a manner that promotes the safety and security of staff, inmates, and others. Inmates deemed to be at risk of sexual abuse will be recommended for separation from those inmates deemed to be a high risk of being sexually abusive.

During interviews with staff who are responsible for risk screening, the Auditor was informed that because of the assessment procedures being utilized, each inmate is individually evaluated. Staff not only use the assessment procedures which are in place, additional consideration is given to the discussions with each individual inmate when making classification and housing decisions.

Provision (c):

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 3, 3, A, states as required under PREA standard 115.41(f), within 30 days of an inmate's arrival to the facility, a classification officer will reassess an inmate's risk of victimization or abusiveness based upon any additional relevant information received by the facility since the inmate's initial screening. All reassessments that may require an inmate to be moved to another housing assignment or custody level due to their perceived risk of sexual abuse or abusiveness will be referred to the classification officer's supervisor/designee for final approval. The PREA Coordinator will be notified of any approvals. Documentation of the PREA Coordinator's notification will be maintained for record keeping purposes. (See Policy 300.0 – Initial Classification and Reclassification for additional information.)

GCDC Policies and Procedures, Chapter 300: Classification Policy 300.0, Inmate Classification/Reclassification, dated January 1, 2018, p. 2, 1, C, states all inmates will be classified in accordance with this policy and assigned a housing unit based on this policy. Inmates will be notified of their initial classification verbally prior to being moved to their housing assignments. An inmate's initial classification will be documented and maintained on Inmate Locator Cards and in each respective Control Room.

GCDC Policies and Procedures, Chapter 300: Classification Policy 301.0, Administrative Separation (Special Management, Protective Custody, Medical/Mental health Observation), dated January 1, 2018, p. 4, a, states Consistent with PREA Standards, when deciding whether to assign a transgender or intersex inmate to a male or female housing unit, and in making other housing and program assignments, staff will consider on a case-by-case basis whether placement of the inmate would ensure the inmate's health and safety and whether placement would present management or security problems (Standard 115.42(c)). To the extent possible consistent with safety and security needs, a transgender or intersex inmate's own views with respect to his/her own safety will be given serious consideration (Standard 115.42 (e)). Any decisions regarding housing, program or work assignments will be fully documented, and the reasons for such decisions will be documented

During interviews with staff who are responsible for risk screening, they indicated the Transgender or Intersex inmates view of their own safety is taken into serious consideration when determining housing placements and programming assignments. In addition, the staff who are responsible for risk screening indicated because of the assessments that are utilized, each inmate is evaluated individually.

The interview notes of the PC indicated according to GCDC policy, the gender identification of each inmate is initially determined by their legal sex assignment, generally at birth; however, from that point forward every inmate is individually assessed and classified to ensure the safety of each inmate, as well as the safety of the inmate population.

There were no transgender or intersex inmates in the facility at the time of the on-site audit. Therefore, no interviews were conducted.

Provision (d):

During interviews with the PC, PCM and staff responsible for screening, all indicated the Transgender or Intersex inmate's views of their own safety is given great weight when making decisions regarding housing placement or programming assignments. They further confirmed that regular classification reassessments are conducted a minimum of every six months, or if the inmate is involved in an incident of a sexual nature.

GCDC policy dictates placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

There were no transgender or intersex inmates in the facility at the time of the on-site audit. Therefore, no interviews were

conducted.

Provision (e):

As stated in (a), the Auditor was able to review the intake process and interview classification staff who were able to explain the classification process.

GCDC policy dictates that a transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

During interviews with the PCM and staff responsible for screening, all specified the transgender or intersex inmate's views of their own safety is given great weight when making decisions regarding housing placement or programming assignments. These inmates are interviewed further to determine enemies and potential or perceived threats. Housing placement and programming assignments are based on this information.

There were no transgender or intersex inmates in the facility at the time of the on-site audit. Therefore, no interviews were conducted.

Provision (f):

According to the PC, PCM and the staff responsible for risk screening, each indicated the Transgender or Intersex inmate's views of their own safety is given serious consideration when providing showering options. In addition, they clarified, transgender or intersex inmates would be able to shower separately from other inmates by utilizing alternate shower times.

As previously identified, each of the housing units have bathrooms with shower stalls that have screens for use by transgender or intersex inmates for additional privacy, if desired. The random staff who were interviewed also indicated that if a transgender or intersex inmate asked to shower separately, they would arrange a separate shower time from the other inmates.

There were no transgender or intersex inmates in the facility at the time of the on-site audit. Therefore, no interviews were conducted.

Provision (g):

The interview with the PCM and the PCM, revealed that neither the Georgetown County Sheriff's Office or GCDC are under any consent decree, legal settlement, or legal judgment requiring the establishment of a dedicated facility, unit, or wing for lesbian, gay, bisexual, transgender, or intersex (LGBTI) inmates. All indicated that all LGBTI inmates are housed within the general population unless specific issues are present and only then the appropriate staff will meet with the inmate and address the concerns.

During an interview with one LGBTI inmate, it was reported she was housed in general population and was not currently, nor had she ever been, housed in a housing unit designed for only LGBTI inmates. The Auditor reviewed an inmate roster and confirmed that all LGBTI inmates were housed in general population.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding the use of screening information. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation)
- Inmate Records

Observations during on-site review

Interviews:

- PREA Compliance Manager (PCM)

Provision (a):

GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation), p. 4, 2, states consistent with PREA standards, inmates deemed to be at high risk for sexual victimization will not be placed in involuntary segregation (or protective custody) unless an immediate assessment is conducted of all other available alternative means of housing the inmate. In such cases, the Detention Center Director and the PREA Coordinator will be notified to assist in the assessment and final recommendation to place the inmate in administrative separation status. If an assessment is unable to be conducted immediately, inmates may be placed in involuntary protective custody for no more than 24 hours while the assessment is made.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, 7, B, indicates Inmates at high risk for sexual victimization will not be placed in involuntary segregation (or protective custody) unless an assessment of all available, alternative means of housing the inmate has been made and a determination has been reached that there are no other, available alternative means of separation from likely abusers. In cases such as this, the PREA Coordinator and/or the Detention Center Director/designee will be contacted to assist in the assessment. If an assessment is unable to be conducted immediately, inmates may be placed in involuntary protective custody for no more than 24 hours while completing the assessment

The PAQ reflects during the past twelve months there have been zero inmates placed into involuntary administrative or punitive segregation in accordance with this standard. The Auditor interviewed the PCM specific to this issue and she confirmed there have not been any inmates placed in protective custody in the past twelve months.

Provision (b):

GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation), p. 1, states consistent with PREA Standards, the placement of an inmate in involuntary administrative separation status (also referred to as protective custody) due solely to his/her perceived risk of sexual victimization or due to his/her sexual orientation, gender identity status, intersex status, age, or transgender status, will be prohibited unless an assessment of all other available housing resources has been exhausted and there are no other alternatives for separating the inmate from likely abusers. Should an assessment be unable to be completed immediately, an inmate may be involuntarily housed in administrative separation status until such a time that an assessment can be completed (generally, by the next working day or not greater than 48 hours.)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, B, 3, states The inmate must have access to programs, privileges, education, and work opportunities. If any restrictions are placed on the inmate concerning access to programs, privileges, or work opportunities, the PREA Coordinator/designee will document the opportunities that have been limited, the duration of the limitation, and the reason for the limitation. All documentation will be maintained in the inmate's confinement record.

The PAQ reflects during the past twelve months there have been no inmates placed into involuntary administrative or punitive

segregation in accordance with this standard. The Auditor interviewed the PCM specific to this issue and she confirmed there have not been any inmates placed in protective custody in the past twelve months. Consequently, no inmates could be interviewed relative to this provision.

Provision (c):

GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation), p. 2, A, 5, states in situations where an inmate may be identified or suspected of being sexually victimized or being sexual abusive, a decision may be made to separate the victim and/or abuser to promote the safety and security of the victim and/or others.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, B, 4, states the inmate must be reviewed every 30 days to determine whether there is a continued need for separation from the general population. Reviews will be conducted every 30 days by the PREA Coordinator/designee and will be forwarded to the Detention Center Director/designee for final, written approval.

The PAQ reflects during the past twelve months there have been no inmates placed into involuntary administrative or punitive segregation in accordance with this standard, specific to a period longer than thirty-days, while awaiting alternative placement. The Auditor interviewed the PCM specific to this issue and she confirmed there have not been any inmates placed in protective custody in the past twelve months.

Provision (d):

GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation), p. 3, B, 2, states inmates housed in administrative separation will be allowed the same privileges and programming opportunities as inmates housed in the general population. If there are any restrictions made that limit an inmate's access to the same, documentation must be maintained that supports the legitimate security and safety reasons used to justify the limitation, the duration of the limitation, and the name/type of program, service, privilege or opportunity limited. All documentation will be filed in the inmate's confinement record for record-keeping purposes. If the reason for the limitation is due to medical reasons, the files will indicate "medical order".

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 9, B,1 and 2, states:

1. Written documentation will be made by the PREA Coordinator and approved by the Detention Center Director/designee, clearly setting forth the rationale and reasons for maintaining the inmate in protective custody status;
2. Written documentation will be made by the PREA Coordinator and approved by the Detention Center Director/designee, that clearly sets forth the reasons why no alternative means of separation can be made, to include any attempts made to seek transfer of the inmate to another facility

The PAQ reflects during the past twelve months there have been no inmates placed into involuntary administrative or punitive segregation in accordance with this standard, specific to a period longer than thirty-days, while awaiting alternative placement. The Auditor interviewed the PCM specific to this issue and she confirmed there have not been any inmates placed in protective custody in the past twelve months.

Provision (e):

GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation), p. 5, 2, D, states to the extent possible, the inmate will not be maintained in this status for longer than 30 days. If the length of stay exceeds 30 days, the inmate will be reassessed every 30 days thereafter by the PREA Coordinator to determine the need to maintain the inmate in this status. Recommendations to maintain the inmate on this status will be forwarded to the Detention Center Director for written approval. Documentation of the PREA Coordinator's recommendation and the Detention Center Director's/designee's approval/disapproval will be maintained in the inmate's confinement record and will also be provided to the inmate

During the past twelve months there have been no inmates placed into protective custody in accordance with this standard. This was confirmed via the PCM through the interview process.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding protective custody. No recommendations or corrective action.

115.51

**Inmate reporting**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018
- PREA Inmate Handout, 2019
- MOU between GCDC and Myrtle Beach Rape Crisis Center
- PREA Posters in English and Spanish

Observations during on-site review

Interviews:

- PREA Compliance Manager (PCM)
- Random Staff
- Random Inmates

Provision (a):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, pp. 10-11, 9, A, 10, 1-4, explains inmates may report sexual abuse or harassment in any of the following manners:

1. Inmates may report incidents of sexual abuse or harassment to any employee, contractor, or volunteer or outside party without fear of retaliation. Notified employees are required to immediately complete an Incident Report describing the inmate's complaint. The form will initially be submitted to an on-duty supervisor for necessary action. The receiving supervisor will ensure that all Incident Reports are immediately submitted to the PREA Coordinator. Once notified, the PREA Coordinator will immediately initiate a formal investigation into the matter consistent with procedures outlined in #10, below. (NOTE: If the on-duty supervisor is a subject on the allegation, the form will be submitted to the next higher authority.)
2. Inmates may also submit grievances consistent with the procedures outlined in Policy 701.0 – Inmate Grievance System or may submit a request through the commissary kiosk messaging system and report incidents of sexual abuse or harassment. All grievances and requests will be immediately forwarded to the PREA Coordinator. The PREA Coordinator will ensure a formal investigation into the matter consistent with procedures outlined in #10, below will be initiated.
3. Inmates may utilize the detention center phone system to report incidents of sexual abuse or harassment to an outside party not affiliated with the detention center or the Sheriff's Office. The PREA Coordinator/designee will assist in identifying and ensuring an outside agreement is entered into with an outside party for this purpose.

Inmates will be provided information on how to utilize the phone system to contact the agreed upon outside party. At a minimum, written instructions will be provided on or near each inmate phone system and in posted notices providing the necessary contact information for this purpose. The outside contact will be responsible for contacting the PREA Coordinator and/or Detention Center Director when allegations are reported so that necessary steps can be taken to protect the alleged victim and an investigation can be initiated as outlined in #10, below. (NOTE: The PREA Coordinator and/or Detention Center Director receiving the report will ensure a detailed Incident Report is completed to document the contact.)

4. The detention center will post notices or will provide information to non-English speaking inmates on accessing the county's contracted Language Line service. This service provides translation services via the phone for non-English speaking inmates. Detention center staff will receive training on this service.



The PREA Inmate Handout, 2019, states that allegations can be reported in several ways:

1. In writing, using a Grievance Form or by submitting a through the commissary kiosk system. Your report will be forwarded to the PREA Coordinator for confidential investigation.
2. If you would rather report to an outside party not affiliated with the detention center, you may call Myrtle Beach Rape Crisis Center (843) 448-7273 from any inmate phone. This is a free call to an outside party trained to respond to your call. You may report a known or suspected PREA incident either anonymously or with your name. Please provide as much information about the victim and the perpetrator so that your allegation can be thoroughly investigated and, if necessary, the two parties can be separated.
3. Verbally, to any staff member.
4. A friend or family member can also report an incident either by calling the detention center and speaking with the PREA Coordinator or Detention Center Administrator or by mail to the PREA Coordinator or Administrator. Please know, that should a third party report an incident, the detention center may require as a condition the alleged victim to agree to have the allegation investigated

The staff interviewed all indicated they would accept a report or allegation from an inmate and provide it to their supervisor for further direction. They also reported inmates can report several different ways which includes telling a staff member, calling the PREA telephone number posted throughout the facility, or telling a family member. Staff interviewed stated inmates can privately report sexual abuse or sexual harassment as well, by contacting the PREA Coordinator or contacting the Georgetown County Sheriff's Office.

The inmates interviewed regarding this provision all reported they were aware of multiple ways to report incidents of sexual abuse or sexual harassment. These included using the hotline number, contacting the PCM, have family member contact the institution, contacting a staff member, and "writing to the address on the poster." Most indicated they would tell a staff member first.

During the on-site portion of the audit, the Auditor observed numerous different PREA posters in both English and Spanish throughout the facility. These posters were observed in each housing unit, common areas, main hallways, intake holding area, dining room, etc. The Auditor checked numerous inmate telephones throughout the facility, and all were in working order and readily available in each housing unit.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 10, 9, A, 3, states inmates may utilize the detention center phone system to report incidents of sexual abuse or harassment to an outside party not affiliated with the detention center or the Sheriff's Office. The PREA Coordinator/designee will assist in identifying and ensuring an outside agreement is entered into with an outside party for this purpose.

Inmates will be provided information on how to utilize the phone system to contact the agreed upon outside party. At a minimum, written instructions will be provided on or near each inmate phone system and in posted notices providing the necessary contact information for this purpose. The outside contact will be responsible for contacting the PREA Coordinator and/or Detention Center Director when allegations are reported so that necessary steps can be taken to protect the alleged victim and an investigation can be initiated as outlined in #10, below. (NOTE: The PREA Coordinator and/or Detention Center Director receiving the report will ensure a detailed Incident Report is completed to document the contact.)

The MOU between GCDC and Myrtle Beach Rape Crisis Center provides documentation of the outside agency the inmates may contact to report allegations.

The inmates interviewed regarding this provision, all reported they were familiar with an outside agency and said they knew they offered services, but not all were clear on exactly what services they offered.

During the on-site tour, each phone that was tested was in working order and could be used to call out.

GCDC does not detain inmates solely for civil immigration purposes.

Provision (c):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 12, C, 1-3 states:

1. Any outside or third party, i.e., fellow inmate, family member, friend, attorneys, chaplain, etc., may report a PREA incident by contacting the PREA Coordinator directly by phone, in writing, or in person.

2. If a third- or outside-party files a report, the PREA Coordinator may require as a condition of processing the report that the alleged victim agree to have the report filed on his/her behalf. If the inmate declines to have the report processed, the PREA Coordinator will document the inmate's decision. All approved reports are to be investigated as described in Procedure #10.

3. The PREA Coordinator/designee will distribute written information on how to file a report of sexual abuse or harassment so that third parties are advised of these procedures. This will be accomplished through publication of a brochure entitled, The Prison Rape Elimination Act: Important Information for Family Members, Friends and Visitors. Copies of this brochure will be maintained in the detention center lobby and will be provided to contractors and volunteers upon their initial assignment to the facility. The PREA Coordinator and Detention Center Director may also place information pertaining to PREA on the detention center website, if available. Documentation of all public information will be maintained by the PREA Coordinator.

The inmates interviewed regarding this provision, 100% indicated they were aware of the ability to make reports of sexual abuse or sexual harassment in person and in writing.

Provision (d):

The PAQ states GCDC staff may report anonymously to the PREA Coordinator, to the PREA Compliance Manager and the Georgetown County Sheriff's Office.

Through interviews with the staff, several methods for staff to privately report sexual abuse of inmates were identified. All staff indicated they may choose to make a private report to their supervisor, another supervisor, the facility PCM, PREA Coordinator or the Georgetown County Sheriff's Office.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding inmate reporting. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018
- Investigation Records

Interviews:

- Random and Specialized Staff
- Random and Targeted Inmates

Provision (a):

In the PAQ the facility reported the agency has an administrative procedure for dealing with inmate grievances regarding sexual abuse and sexual harassment. The PAQ also reflects, GCDC had two grievances in the past twelve months.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 10, A, 2, states inmates may also submit grievances consistent with the procedures outlined in Policy 701.0 – Inmate Grievance System or may submit a request through the commissary kiosk messaging system and report incidents of sexual abuse or harassment. All grievances and requests will be immediately forwarded to the PREA Coordinator.

Through formal interviews with inmates, it was reported they could file a grievance to report an allegation of sexual abuse. The Auditor asked each inmate interviewed if he could file a grievance alleging an imminent risk of sexual abuse. The inmates were aware of the grievance process and no offender interviewed had done so. Most inmates stated they would immediately notify a staff member as that is the quickest way to report. Some inmates stated they might use the hotline number. Each inmate was asked if he was required to give his name when alleging sexual abuse. All inmates were aware they could submit an allegation anonymously.

Provision (b):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 3, 4, B, states for PREA related matters, the time limits for submission of a grievance will be waived.

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 6, states the Georgetown County Detention Center will not require an inmate to attempt to informally resolve an allegation of sexual abuse or harassment. All grievances involving allegations of sexual abuse and/or harassment will be immediately submitted to the Detention Center Director and the PREA Coordinator.

Provision (c):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 6, states no grievance submitted by an inmate will be turned over or referred to any staff member who is the subject of the grievance.

Provision (d):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 6, indicates Georgetown County officials will be allowed up to 90 days to respond to the merits of the allegation. The 90 days will begin on the date of the initial filing of the inmate's grievance. Computation of the 90-day time period does not include time consumed by the inmate in preparing an administrative appeal

During the on-site review of documentation, the Auditor reviewed investigation records in which three allegations were reported and confirmed all time frames had been met.

Provision (e):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 6, specifies third parties, including other fellow inmates, staff, family members, legal counsel and outside advocates, will be permitted to assist inmates in filing requests for administrative remedies related to allegations of sexual abuse and will be permitted to file such requests on behalf of inmates. If a third-party files for an inmate, the detention center may require as a condition of processing the request, the alleged victim to agree in writing to have the request filed on their behalf and may also request the victim to personally pursue any subsequent steps in the administrative remedy process. If the inmate declines to have the request processed on his/her behalf, the detention center will ensure the inmate communicates this decision in writing. All requests made by, for and to the inmate will be made in written form and the PREA Coordinator will be responsible for maintaining all documentation for record keeping purposes.

Provision (f):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 7, states an inmate may file an emergency grievance alleging that he/she or another inmate is subject to substantial risk of imminent sexual abuse. Emergency grievances will be immediately forwarded to the Detention Center Director and to the PREA Coordinator so that immediate corrective action can be taken. Should the Detention Center Director and/or the PREA Coordinator be unavailable, the emergency grievance will be forwarded to the highest-ranking staff member on duty. Under no circumstances will an emergency grievance of this type be forwarded to any staff member who may be a subject of the emergency grievance.

Through the interview process with staff, the Auditor confirmed staff were aware that inmates could submit grievances alleging a risk of imminent sexual abuse or to report an allegation of sexual abuse. Facility staff understood the procedures for submitting these emergency grievances alleging a risk of imminent sexual abuse. Supervisors were aware of the time limits in response to an emergency grievance alleging an imminent risk of sexual abuse.

GCDC reported zero emergency grievances in the past twelve months.

Provision (g):

GCDC Policies and Procedures, Chapter 700: Programs and Services Policy 701.0, Inmate Grievances, dated January 1, 2018, p. 7, specifies the detention center may discipline an inmate for filing a grievance related to alleged sexual abuse when the detention center can demonstrate the inmate filed the grievance in bad faith.

GCDC reported in the past 12 months, there were two inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmates for having filed the grievance in bad faith.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding exhaustion of administrative remedies. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 200: Inmate Intake and Booking Policy 207.0, Inmate Handbook and Orientation Training, dated January 1, 2018
- MOU between GCDC and Myrtle Beach Rape Crisis Center
- PREA Posters

Observations during on-site review

Interviews:

- Random and Targeted Inmates
- PREA Compliance Manager (PCM)

Provision (a):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, C, states a victimized inmate may at any time request a victim advocate or other qualified staff member or contracted organization to accompany him/her through the forensic medical examination process or investigatory interview process. Victim advocates, qualified staff members or approved organizations may also be requested by the inmate to provide emotional support, crisis intervention, information and referrals. Inmates desiring such support will make a confidential, written request to the PREA Coordinator who will meet with the inmate to discuss and to arrange for such services. To the extent possible consistent with security and safety requirements, the facility will provide inmates with confidential access to such services and will provide inmates access to such individuals and/or organizations via mail or telephone/telephone hotline services. The facility will inform inmates prior to giving them access to such services' numbers and addresses, the extent to which the facility may monitor communications in accordance with mandatory reporting laws.

The Auditor spoke with the PCM and was informed a victim advocate is made available to be present with the victim before, during and following the examination. Additionally, the advocate conducts follow-up contacts with the victim to ensure aftercare is arranged and firmly in place.

The inmates interviewed, readily admitted there was a telephone number and address available to them to contact someone in the event of sexual abuse or sexual harassment.

Each inmate interviewed, reported the call was free and confidential. Each responded they knew about an outside resource because of the PREA training and the posters around the facility. Each responded they knew some of the information they provided might be given to the facility staff.

During the tour of the facility, the Auditor observed PREA posters and paintings (English and Spanish) on the walls throughout the facility. These posters and paintings around the facility as well as the Inmate Handbook, let inmates know they can notify the PCM, or other staff member, of any incident of sexual abuse or sexual harassment.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 11, C, states in part, The facility will inform inmates prior to giving them access to such services' numbers and addresses, the extent to which the facility may monitor communications in accordance with mandatory reporting laws.

On the PAQ the facility reported it tells inmates the extent to which communications will be monitored and the limits of confidentiality due to mandatory reporting laws.

Of the inmates interviewed, all reported there was a tollfree number and address available to them to contact someone in the

event of sexual abuse or sexual harassment. Further each inmate stated they understood there were limits to confidentiality and some information might be reported back to facility staff.

The Auditor spoke with the PCM and was instructed a victim advocate is made available to be present with the victim before, during and following the examination. She further reported staff and advocates have a responsibility to inform any victim that some information the victim shares with them may need to be provided to facility staff. This information may be medical and/or non-medical, for purposes such as institutional security, PREA investigation, and further medical and mental health services.

Provision (c):

On the PAQ the facility reported it maintains memoranda of understanding (MOU) or other agreements with community service providers that are able to provide inmates with emotional support services related to sexual abuse.

GCDC Memorandum of Understanding with Myrtle Beach Rape Crisis Center documents the agreement with a rape crisis center for victim advocate services.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding inmate access to outside confidential support services. No recommendations or corrective action.

115.54	<b>Third-party reporting</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Provision (a):</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 12, C, 1-3, states:</p> <ol style="list-style-type: none"> <li>1. Any outside or third party, i.e., fellow inmate, family member, friend, attorneys, chaplain, etc., may report a PREA incident by contacting the PREA Coordinator directly by phone, in writing, or in person.</li> <li>2. If a third- or outside-party files a report, the PREA Coordinator may require as a condition of processing the report that the alleged victim agree to have the report filed on his/her behalf. If the inmate declines to have the report processed, the PREA Coordinator will document the inmate's decision.</li> <li>3. The PREA Coordinator/designee will distribute written information on how to file a report of sexual abuse or harassment so that third parties are advised of these procedures. This will be accomplished through publication of a brochure entitled, The Prison Rape Elimination Act: Important Information for Family Members, Friends and Visitors. Copies of this brochure will be maintained in the detention center lobby and will be provided to contractors and volunteers upon their initial assignment to the facility. The PREA Coordinator and Detention Center Director may also place information pertaining to PREA on the detention center website, if available. Documentation of all public information will be maintained by the PREA Coordinator.</li> </ol> <p>GCDC publishes how third-parties can make PREA reports in all common areas, including the lobby. GCDC has signs posted throughout the facility of their zero-tolerance policy. Instructions are posted on the GCDC website of how to make a PREA report and how a third party can make a PREA report. PREA brochures in English and Spanish are made readily available to the general public.</p> <p><a href="https://www.gcsheriff.org/enforcement-division/detention-center/pre">https://www.gcsheriff.org/enforcement-division/detention-center/pre</a></p> <p>a</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding third party reporting. No recommendations or corrective action.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Observations during on-site review

Interviews:

- Random Staff and Specialized Staff
- PREA Compliance Manager (PCM)
- Detention Center Director

Provision (a):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 11, B, 1, indicates any employee who has knowledge, suspicion or information regarding an incident of sexual abuse or harassment that occurred in the detention center; has knowledge, suspicion or information concerning retaliation against an inmate for reporting an incident of sexual abuse; or who has knowledge, suspicion or information concerning any neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or harassment within the detention center, will be required to immediately report the information or incident directly to their immediate supervisor. The employee will complete an Incident Report for immediate submission to their supervisor. The supervisor will review the report and will submit the report directly to the PREA Coordinator for necessary investigation as described in Procedure #10, below. The completed Incident Report will be maintained by the PREA Coordinator for record keeping and documentation purposes. (NOTE: If the supervisor is the subject of the complaint or allegation, the employee may report the allegation or suspicion to the next supervisory level.)

During interviews with staff, 100% were aware of this requirement and were able to explain how they would immediately report an allegation of sexual abuse in a manner compliant with policy. Moreover, each verbalized information received from a victim should remain confidential, with them only notifying staff that needed to know, i.e., their supervisor, medical staff, etc. All staff indicated PREA related allegations and reports go to the PCM, who then notifies the investigative staff.

Provision (b):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 11, B, 2, states apart from reporting to designated supervisors or officials, employees, contractors and volunteers will not reveal any information related to a sexual abuse report to anyone other than necessary to make treatment, investigation, and other security and management decisions.

During interviews with staff, 100% were aware of this requirement and were able to verbalize how they would immediately report an allegation of sexual abuse. Further, each articulated information received from a victim should remain confidential, with them only notifying staff that needed to know, i.e., their supervisor, medical staff, etc.

Provision (c):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 13, G, states any information provided to an employee concerning sexual abuse/harassment incidents will be considered confidential. Any information provided to employees will only be shared consistent with and according to standards required by state statute, professional licensure and ethical standards or to the procedures outlined in this policy.

During interviews with medical and mental health individuals, 100% were aware of this requirement and were able to verbalize how they would immediately report an allegation of sexual abuse. Further, each verbalized their understanding of the policy as well as their rights and responsibilities. They all articulated they were obligated to advise the victim (inmate) of the limitations of confidentiality, due to the mandatory reporting law, prior to the initiation of services.

Provision (d):



GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 12, D, states consistent with S.C. Code of Law §63-7-310, when an inmate under the age of 18 files a report of sexual assault; a staff member files a report involving a known or suspected incident of sexual abuse or assault involving an inmate under the age of 18; or when a third party files such a report, the receiving PREA Coordinator and/or Detention Center Director will immediately notify investigative authorities of the incident and will follow the verbal notification with a copy of a written Incident Report. The Incident Report will be used to document the notification, as well as the known circumstances involving the incident. Upon receipt of the notification, the investigative authority is required, by statute, to immediately contact the S.C. Department of Social Services in the county where the juvenile resides to notify them of the incident. Reports of abuse may be made orally, by telephone or otherwise to the county department of social services by the investigative authority.

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws

Interviews with the Detention Center Director and the PCM, revealed they were aware of this requirement and would report any abuse allegations to the appropriate agency, as required by law, as well as the PCM and agency investigators.

Provision (e):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 11, B, 1, indicates any employee who has knowledge, suspicion or information regarding an incident of sexual abuse or harassment that occurred in the detention center; has knowledge, suspicion or information concerning retaliation against an inmate for reporting an incident of sexual abuse; or who has knowledge, suspicion or information concerning any neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or harassment within the detention center, will be required to immediately report the information or incident directly to their immediate supervisor. The employee will complete an Incident Report for immediate submission to their supervisor. The supervisor will review the report and will submit the report directly to the PREA Coordinator for necessary investigation as described in Procedure #10, below. The completed Incident Report will be maintained by the PREA Coordinator for record keeping and documentation purposes. (NOTE: If the supervisor is the subject of the complaint or allegation, the employee may report the allegation or suspicion to the next supervisory level.)

In interviews with the PCM, confirmed allegations of sexual abuse and sexual harassment are reported to the PCM and the appropriate investigators.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding staff and agency reporting duties. No recommendations or corrective action.

115.62	<b>Agency protection duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Agency Head</li> <li>· Detention Center Director</li> <li>· Random Staff</li> </ul> <p>Provision (a):</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018,, p. 11, B, 3, states should an employee learn that an inmate may be subject to a substantiated risk of imminent sexual abuse, he/she will take immediate action to protect the inmate. The employee will immediately report this information to his/her supervisor and will complete an Incident Report for immediate dissemination to the PREA Coordinator. The PREA Coordinator will immediately, upon receipt of the Report, initiate an investigation and will, if needed, consult with other supervisory employees to determine the appropriate steps to take to immediately protect the inmate. Should a determination be made to place the inmate in protective custody, the procedures outlined in #7.B., Protective Custody, above will be followed.</p> <p>Interview notes reflect the AH indicated if he received such information, he would contact the facility where the inmate was housed and if necessary, the inmate could be temporarily transferred while the investigation was completed. If the perpetrator were identified, the perpetrator would be placed in disciplinary segregation pending completion of the investigation.</p> <p>The Auditor interviewed the Detention Center Director, who stated he would take immediate action to protect the victim (inmate). The victim might be moved to another area of the facility or to another facility all together, depending on what was needed to protect the victim. He stated the perpetrator, if known, would be placed in segregated housing.</p> <p>During random staff interviews, all staff reported if they received an allegation from an inmate, they would immediately separate the victim and the perpetrator, safeguard the victim, contact their supervisor, and preserve evidence.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding agency protection duties. No recommendations or corrective action.</p>

115.63	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Detention Center Director</li> <li>· PREA Compliance Manager (PCM)</li> </ul> <p>Provision (a):</p> <p>On the PAQ, GCDC reported they have not had to notify another facility in the past 12 months.</p> <p>GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 200.0, Legality of Commitment, dated January 1, 2018, p. 2, F, 4, indicates should an inmate indicate during the booking process that he/she was a victim of sexual abuse at another facility, the booking officer will immediately inform his/her supervisor . The supervisor will be responsible for contacting the PREA Coordinator who , in turn , will advise the Detention Center Director. The Director will be responsible for contacting the head of the facility or agency where the abuse occurred as soon as possible, but no more than 72 hours after receipt of the allegation . The Detention Center Director will ensure the PREA Coordinator is informed of the notification so that he/she can document that contact was made.</p> <p>Due to non-occurrence there was not any documentation to review.</p> <p>Provision (b):</p> <p>See Provision (a) for specific details and policies.</p> <p>Through the interview process, it was confirmed that zero inmates reported being sexual abused at another facility.</p> <p>Provision (c):</p> <p>On the PAQ, GCDC reported they have not had to notify another facility in the past 12 months. Due to non-occurrence there was not any documentation to review.</p> <p>Provision (d):</p> <p>See Provision (a) for specific details and policies.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses policies regarding reporting to other confinement agencies. No recommendations or corrective action.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- PREA Training Curriculum

Interviews:

- Detention Center Director
- PREA Compliance Manager (PCM)
- First Responders

Provision (a):

The Detention Center Director indicated First Responder staff have been trained in the PREA process, and frequent training is conducted to ensure competency and compliance.

In the training curriculum, it defines a First Responder as:

1. The first person to know information or coming upon an incident.
2. Upon learning of a PREA allegation that an inmate was sexually abused, the first security staff member to respond to the report is required to take several immediate steps

During staff interviews, all staff, were able to articulate to the Auditor how to respond to a PREA incident. All staff, volunteers and contractors were aware of the mandate to separate the perpetrator from the victim, preserve physical evidence, as well as the area the incident occurred, seek medical aid, as needed, and report the incident.

During interviews with First Responders, all stated they were trained in the PREA process through annual in-service training, on-the-job training, and staff meetings. Each verbalized the PMC frequently reminds them of PREA policies and speaks with them regarding the importance of PREA and safety from sexual abuse or harassment.

Non-custody staff who were interviewed, all stated they would notify custody staff, separate the victim and the perpetrator, direct the victim and the perpetrator not to do anything to destroy evidence and keep the scene secure until custody staff arrived. They all verbalized the importance of, as well as their understanding of the need for confidentiality in all cases.

Provision (b):

In the PREA training curriculum it outlines the responsibilities of a First Responder as:

1. Separate the alleged victim and abuser
2. Preserve and protect any crime scene until appropriate steps can be taken to collect evidence
3. If abuse is within the time period that allows for physical evidence (72 hours), request the alleged victim and abuser do not take any actions that could destroy physical evidence to include: brushing teeth, washing, urinating, defecating, smoking, drinking, or eating.
4. If the first responder is NOT a security staff member, the responder is required to request that the alleged victim not take any action that could destroy physical evidence, and then notify security staff.

First Responder secondary responsibilities are:

1. Record the date and time the incident reportedly occurred
2. Record the date and time the report was made
3. Record who initially reported the allegation

4. Secure the victims clothing and bedding
5. Photograph contents of the scene of the incident (contact CID)
6. Treat the area in question as a crime scene (start log)
7. Remain observant of any person, events, potential evidence and environmental conditions
8. Relay information to the investigative team.

The Auditor's review of the PREA training curriculum that all staff, volunteers, and contractors received, identifies whoever received the information first, as a First Responder. As a First Responder these individuals are trained to take steps to isolate and contain the situation, secure the scene, separate the alleged victim from the alleged perpetrator, remove all uninvolved parties, relay any observations to shift supervisors or the PC.

Conclusion:

Based upon the review and analysis of the available evidence, the Auditor has determined that the GCDC meets every provision of the standard which addresses staff first responder duties. No recommendations or corrective action.

115.65	<b>Coordinated response</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· GCDC PREA training curriculum</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Detention Center Director</li> </ul> <p>Provision (a):</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, pp. 14-18, outlines the coordinated response and the duties of different staff members in length.</p> <p>According to policy, the shift supervisor shall activate the coordinated response plan and ensure the following steps have been taken.</p> <ol style="list-style-type: none"> <li>1. The separation of the alleged victim and perpetrator.</li> <li>2. The security and protection of any crime scene to keep potential evidence in place for examination and investigation.</li> <li>3. Notifications made to the Detention Center Director, investigator, and other designated agency and facility leadership and all required incident reporting procedures.</li> <li>4. The only persons permitted to enter a secured crime scene shall be Kentucky State Police, the assigned investigator or medical staff as needed.</li> <li>5. A log shall be maintained of anyone entering the crime scene and at what time he entered and exited. Anyone entering the crime scene shall be videotaped as additional documentation.</li> <li>6. The area shall remain secured as a crime scene until verification of a completed investigation and released by the investigating authority.</li> </ol> <p>GCDC coordinates actions taken in response to an incident of sexual abuse among first responders, medical and mental health professions, investigators, and Executive Staff. Following the initial response continued coordination between departments is achieved through PREA after action meetings.</p> <p>The Detention Center Director confirmed the steps listed above for First Responders. He indicated each item breaks down what the various responsibilities are for the respective staff members and positions.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC exceeds the standard regarding coordinated response. The coordinated response at GCDC is well thought out and expertly implemented. No recommendations or corrective action</p>

115.66	<p><b>Preservation of ability to protect inmates from contact with abusers</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Human Resources (HR)</li> </ul> <p>Provision (a):</p> <p>According to the PAQ, the agency, facility, or any other government entity is not responsible for collective bargaining on the agency's behalf and has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012 or since the last PREA audit, whichever is later.</p> <p>GCDC is not under a collective bargaining agreement and has the authority to discipline staff members as within the employee discipline policy.</p> <p>According to HR, management does have the right to separate the inmate from a staff member who is the subject of an investigation. This separation can either be temporarily reassigning the employee or redirecting the employee.</p> <p>Provision (b):</p> <p>Auditor is not required to audit this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard preservation of ability to protect inmates from contact with abusers. No recommendations or corrective action.</p>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Detention Center Director
- Staff in Charge of Monitoring Retaliation

Provision (a):

According to the PAQ, the PREA Coordinator has been identified as the individual who is primarily responsible for monitoring possible retaliation.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 13, F, states all inmates, employees, contractors and volunteers who report sexual abuse or harassment or who cooperate with any related investigation are protected from retaliation by other inmates, employees, contractors or volunteers. The PREA Coordinator will be responsible for monitoring retaliation. For at least 90 days following the submission of the report, or longer upon the discretion of the Coordinator, the PREA Coordinator will monitor the conduct and treatment of inmates, employees, contractors and volunteers who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to determine if there are changes that may suggest possible retaliation by inmates, employees, or others. The PREA Coordinator will, at a minimum, ensure the following activities/reports are reviewed during the 90-day period that may suggest retaliation. All reviews will be documented and maintained by the PREA Coordinator for record keeping purposes.

- a. Inmate disciplinary reports;
- b. Inmate housing or program changes; and/or
- c. Negative employee, contractor or volunteer performance reviews or reassignments, reports, or disciplinary action.

Provision (b):

See Provision (a) for specific policy details.

In the interview with the Detention Center Director, the Auditor was informed there are multiple measures used to protect inmates and staff from retaliation. These measures include considering and monitoring if the inmate is being given changes in housing assignments, work assignments or an increase in disciplinary reports. The monitoring of staff includes watching for negative performance reviews or work reassignments. The staff in charge of monitoring retaliation echoed these comments.

Provision (c):

According to the PAQ, GCDC generally monitors for retaliation for a period of 90-days, unless further monitoring is needed. The PAQ also indicated, GCDC did not have any instances of retaliation in the past twelve months.

In the interview with the Detention Center Director, the Auditor was told that retaliation is not tolerated at GCDC. The Warden emphasizes to staff and inmates that they are to speak about PREA issues without fear of retaliation. He stressed that if retaliation does occur, there would be prompt action taken against those responsible for the retaliation. They would be investigated and disciplined. These sentiments were echoed by the staff in charge of monitoring retaliation.

Provision (d):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 13, F, 1, says in part, for at least 90 days following the submission of the report, or longer upon the discretion of the Coordinator, the PREA Coordinator will monitor the conduct and treatment of inmates, employees, contractors and volunteers who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to determine if there are changes that may suggest possible retaliation by inmates, employees, or others. The PREA Coordinator will, at a minimum, ensure the following activities/reports are reviewed during the 90-day period that may



suggest retaliation. All reviews will be documented and maintained by the PREA Coordinator for record keeping purposes.

Provision (e):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 13, 2, states detention center employees will take the steps necessary to ensure the safety of any individual who cooperates with an investigation involving an incident of sexual abuse and/or harassment and who expresses a fear of retaliation. The PREA Coordinator will be contacted in these cases and will be responsible for documenting any agreed upon steps or actions to be taken and for periodically monitoring the implementation of such actions to ensure they are being conducted. The PREA Coordinator will not be required to review or maintain such documentation in cases where the allegation or report of sexual abuse or harassment is determined to be unfounded. The termination of monitoring in these cases will be documented and maintained by the PREA Coordinator.

Provision (f):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 13, 1, says in part, the PREA Coordinator will not be required to review or maintain such documentation in cases where the allegation or report of sexual abuse or harassment has been determined to be unfounded. The termination of monitoring in these cases is, however, to be documented and maintained by the PREA Coordinator.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard agency protection against retaliation. No recommendations or corrective action.

115.68	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 300: Classification Policy 300, Inmate Classification/Reclassification, dated January 1, 2018</li> <li>· GCDC Policies and Procedures, Chapter 300: Classification Policy 301, Administrative Separation (Special Management, Protective Custody, Medical/Mental Health Observation)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· Detention Center Director</li> <li>· Classification Staff</li> </ul> <p>Provision (a):</p> <p>The PAQ indicates GCDC not used segregated housing in the past twelve months for PREA related allegations.</p> <p>Classification staff reported there are multiple housing options available and therefore a sexual abuse victim is not automatically placed in segregation for an inmate's protection.</p> <p>Other alternatives are always explored, and segregation is utilized as</p> <p>a last resort. The Auditor was informed there are numerous areas in the facility to place sexual abuse victims to ensure they are protected from abusers without having to place the victim in segregation housing.</p> <p>Classification staff confirmed inmates are allowed to participate in programs, education, and work while being housed in segregation for protection as a sexual abuse victim, consistent with safety and security needs</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard post allegation protective custody. No recommendations or corrective action.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews with the following:

- Investigative Staff
- Detention Center Director
- PREA Compliance Manager (PCM)

Provision (a)

The PAQ reflects that GCDC has a policy related to criminal and administrative investigations. GCDC conducts all administrative investigations and the Georgetown County Sheriff's Office (GCSO) conducts all criminal investigations.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, A, states upon receipt of a completed Incident Report or notification of an allegation of sexual abuse, the supervisor (or other higher level employee if the subject of the complaint was a shift supervisor) will immediately contact and forward the Report to the PREA Coordinator so that an administrative or criminal investigation can be initiated. Trained investigators from the Georgetown County Sheriff's Office will be utilized to conduct all criminal investigations. The PREA Coordinator will head all administrative investigations. (NOTE: Depending on the severity of the alleged sexual abuse report, the Detention Center Director may opt to have the South Carolina Law Enforcement Division (SLED) conduct the investigation.)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, B, states all allegations of sexual abuse and harassment will be investigated promptly and objectively and generally will be initiated by the end of the shift.

During the interview with the investigator, he indicated investigations begin immediately following notification of the incident. He reported the same protocols are used regardless of how the incident is reported, whether it is in person, telephonically, third party, by mail or anonymously.

Provision (b)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, E, 2, states in part, at a minimum, Sheriff's Office investigators assigned to conduct PREA investigations will receive specialized training in the following areas:

- a. Interviewing sexual abuse victims and perpetrators in confinement settings;
- b. Proper use of Miranda and Garrity warnings during such investigations;
- c. Sexual abuse evidence collection in confinement settings, to include the criteria and evidence required to substantiate a case for administrative action and/or criminal prosecution.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 4, A, 3, states specialized training will be provided for employees who may respond, as part of their duties, to reported incidents of sexual abuse. This training may include, but will not be limited to crime scene management in a confinement facility; elimination of contamination in accordance with blood borne pathogen exposure control programs; evidence collection protocol; and crisis intervention. Employees responsible for criminal investigations related to reports of inmate sexual abuse will receive documented training on conducting investigations in confinement facilities as required under PREA Standards. (NOTE: If investigators used for such purposes are from outside agencies, documentation of such training will be obtained by the PREA Coordinator upon the request of a PREA Auditor.)

Documentation of such training will be requested by the PREA Coordinator upon the request of a PREA Auditor, if necessary

Investigative staff confirmed attendance at these training sessions. The Auditor reviewed the investigators training records

and verified his attendance and participation in all mandated training.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 6, 4, A, 3, states in part training includes, but will not be limited to: crime scene management in a confinement facility; elimination of contamination in accordance with blood borne pathogen exposure control programs; evidence collection protocol; and crisis intervention.

Policy dictates that all allegations of sexual abuse shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence in administrative proceedings and criminal prosecutions.

Investigative staff indicated all investigations follow practically the same investigative format. He stated he interviews the victim first, then any witnesses, leaving the perpetrator for last. He stated it varies slightly if it is an alleged sexual harassment rather than an alleged sexual assault or sexual abuse. If it is an alleged Sexual Assault or Sexual Abuse incident, he will go to the dedicated SAFE/SANE location where the victim is being seen. Except in the cases where the SAFE/SANE team collect the evidence, the investigator indicated he collects and secures all evidence. He was trained in evidence collection. The Auditor reviewed training records, which confirmed this training.

Provision (d)

During the interview process, the investigator reported when the quality of evidence appears to support a criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. The GCSO confirmed if the case appears to be criminal Miranda warnings are given to the person(s)

Provision (e)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, C, says in part the Georgetown County Detention Center will uphold a policy that no employee, contractor or volunteer lessen to any degree the credibility of any victim, witness or suspect because of the person's status as an inmate or detainee. No member of the detention center staff will boost the credibility of any witness or suspect because the individual is a detention center employee, contractor or volunteer.

The investigative staff reported credibility of anyone involved in the investigation is determined through the investigative process. He stated everyone is treated as credible and truthful unless the investigation proves otherwise. He confirmed a polygraph is not used in the investigative process of PREA cases.

Provision (f)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, E, 9, states for investigations that are administrative in nature, an effort will be made by the PREA Coordinator to determine whether the actions, failure to act, or failure of an employee(s) to follow policies and procedures contributed to the incident so that corrective action and, if needed, re-training can be initiated. All administrative investigations will be documented in writing and must include investigative findings and facts based on physical evidence, testimonial evidence, and an objective assessment of the same. Investigative findings will be submitted directly to the Detention Center Director so that appropriate corrective action can be taken. Any corrective action taken will be documented and maintained by the PREA Coordinator for record keeping purposes.

During the interview, the investigative staff reported in administrative investigations he follows the evidence as the investigation unfolds. In following the evidence, he attempts to determine if staff actions or failure to act contributed to the allegation. He summarizes all findings in his report.

Provision (g)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, D, indicates to uphold the detention center's zero tolerance against sexual abuse, the detention center will be committed to criminally prosecuting any substantiated allegations of inmate-on-inmate or employee, contractor or volunteer-on-inmate abuse or misconduct to the fullest extent of the law. No exceptions will be made. No standard higher than the preponderance of the evidence will be considered when determining whether an allegation of sexual abuse or harassment will be substantiated.

When asked about handling criminal investigation, the investigative staff reported he thoroughly documents all steps of the process, including investigative steps, interviews, facts, and findings, up until the point he determines it is criminal in nature. When he determines that the incident rises to the level of criminal prosecution, he will provide an affidavit to the Prosecutor who will determine if charges will be filed

According to the PAQ, in the past twelve months there has been zero substantiated allegations of conduct that were referred for prosecution.

Provision (h)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, D, states to uphold the detention center's zero tolerance against sexual abuse, the detention center will be committed to criminally prosecuting any substantiated allegations of inmate-on-inmate or employee, contractor or volunteer-on-inmate abuse or misconduct to the fullest extent of the law. No exceptions will be made. No standard higher than the preponderance of the evidence will be considered when determining whether an allegation of sexual abuse or harassment will be substantiated.

During the interview, the investigator indicated if the investigation uncovers evidence that a crime has been committed, he will provide an affidavit to the Prosecutor who will determine if charges will be filed. The full documentation of investigation by the GCSO is kept within their office. The institution keeps a file with documentation that corresponds with actions within the facility, i.e.: Responder Check-off (Supervisory, Medical, Mental Health), 30-day reviews, sign-off form for offenders housing choice, etc.

Provision (i)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, E, 3, states written investigative reports will be maintained for as long as the alleged abuser is incarcerated at the facility or employed by the facility, plus five (5) years. (NOTE: The departure of the alleged abuser or victim from the employment or control of the facility will not be used as a basis for terminating an investigation.)

Provision (j)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, C, indicates the release or transfer of the alleged victim(s) or perpetrator(s), or the termination, suspension or voluntary departure of an employee(s) involved in the incident, will not be grounds to terminate any investigation. The Georgetown County Detention Center will uphold a policy that no employee, contractor or volunteer lessen to any degree the credibility of any victim, witness or suspect because of the person's status as an inmate or detainee. No member of the detention center staff will boost the credibility of any witness or suspect because the individual is a detention center employee, contractor or volunteer.

During the interview, the investigator confirmed that if a principle (victim or abuser) is released or terminated from the agency, it in no way alters the investigation. The investigation continues to its natural end regardless of the employment or residence of the individuals involved.

Provision (k)

Through the interview process the Detention Center Director confirmed the requirements of evidence protocol and forensic medical examinations shall also apply to any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails as well as any Department of Justice component that is responsible for investigating allegations of sexual abuse in prisons or jails.

Provision (l)

During the interview, the Detention Center Director confirmed GCDC cooperates with the GCSO in criminal investigations, to maintain fluidity of information of the progress of the investigation.

Conclusions

Based upon the review and analysis of all available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding criminal and administrative agency investigations. No recommendation or corrective action.

<b>115.72</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documentation Reviewed</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> </ul> <p>Interviews with the following:</p> <ul style="list-style-type: none"> <li>· Investigative Staff</li> </ul> <p>Provision (a)</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 10, D, indicates to uphold the detention center's zero tolerance against sexual abuse, the detention center will be committed to criminally prosecuting any substantiated allegations of inmate-on-inmate or employee, contractor or volunteer-on-inmate abuse or misconduct to the fullest extent of the law. No exceptions will be made. No standard higher than the preponderance of the evidence will be considered when determining whether an allegation of sexual abuse or harassment will be substantiated.</p> <p>The Auditor interviewed investigative staff who relayed that during an investigation, all available evidence is collected (from the victim, from the perpetrator, from the scene; interviews; etc.).</p> <p>Conclusions</p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding evidentiary standard for administrative investigations. No recommendation or corrective action.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews with the following:

- Detention Center Director
- Investigative Staff

Provision (a)

On the PAQ, GCDC indicated they had four allegations for sexual abuse and harassment in the past twelve months. All investigations had been closed at the time of the on-site audit. All victims were notified in writing of the results of the investigation. Documentation of these notification were reviewed while onsite.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, pp. 16-17, 12, A, states following an investigation into an inmate's allegation that he/she suffered sexual abuse, the PREA Coordinator will inform the inmate whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. All communication will be completed in written format to the inmate. The PREA Coordinator will maintain copies of all written follow-up reports for documentation purposes.

In interviewing the investigative staff, the Auditor was instructed the final step of the investigation process, takes place after all findings have been determined. At the conclusion of any PREA investigation a close out memorandum of the investigation and details of how the decision was made regarding the outcome is issued. The PREA Coordinator is then responsible for notifying the inmate of the outcome of the administrative investigation

Provision (b)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, pp. 16-17, 12, A, states in part, if the investigation was conducted by an outside agency, the PREA Coordinator will request relevant information from the investigative agency in order to inform the inmate.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 12, B, indicates unless the inmate's allegation has been unfounded, the PREA Coordinator will subsequently inform an inmate following an allegation that an employee, contractor or volunteer has committed sexual abuse against the inmate, whenever:

1. The employee, contractor or volunteer is no longer posted in his/her housing unit;
2. The employee, contractor or volunteer is no longer employed/contracted by the facility;
3. The facility learns the employee, contractor or volunteer has been indicted on a charge of sexual abuse within the facility;
4. The facility learns the employee, contractor or volunteer has been convicted on a charge related to sexual abuse within the facility.

All notifications to the inmate will be made in writing and will be maintained by the PREA Coordinator for documentation and record keeping purposes.

Provision (d)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 12, C, indicates following an inmate's allegation that another inmate has sexually abused he/she, the PREA Coordinator will inform the alleged victim whenever:

1. The abuser has been indicted on a charge related to sexual abuse within the facility;

2. The abuser has been convicted on a charge related to sexual abuse within the facility.

All notifications to the inmate will be made in writing and will be maintained by the PREA Coordinator for documentation and record keeping purposes.

Provision (e)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 12, B, indicates all notifications to the inmate will be made in writing and will be maintained by the PREA Coordinator for documentation and record keeping purposes.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 12, C, indicates all notifications to the inmate will be made in writing and will be maintained by the PREA Coordinator for documentation and record keeping purposes.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 12, D, indicates the PREA Coordinator's obligation to provide reports to inmates as described in Procedure #12. A. - C., will be terminated when the inmate is released from the custody of the detention center

Provision (f)

Auditor is not required to audit this provision.

Conclusions

Based upon the review and analysis of all available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding reporting to inmates. No recommendation or corrective action.



115.76

**Disciplinary sanctions for staff**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 101.0, Standards of Conduct and Ethics, effective September 15, 2021
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Detention Center Director
- PREA Compliance Manager (PCM)

Provision (a)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 13, A, 1, states in part, employees are subject to disciplinary action up to and including termination for violating any agency sexual abuse or harassment policies.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 101.0, Standards of Conduct and Ethics, effective September 15, 2021, p. 9, states no employee will not develop an inappropriate personal relationship with an inmate, an inmate's family member(s), or an inmate's friend. Such relationships can jeopardize the employee's ability to conduct his/her duties equitably or fairly or can impact an employee's impartiality towards that inmate. Violation of this directive will result in investigation and, for founded violations, to disciplinary action up to and including termination and to possible criminal prosecution.

Provision (b)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 13, A, 1, states employees are subject to disciplinary action up to and including termination for violating any agency sexual abuse or harassment policies. Termination will be mandatory for any employee who has engaged in substantiated claims of sexual abuse. All applicable personnel policies, regulations and standards, regarding employee discipline and termination will be followed in these cases.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 101.0, Standards of Conduct and Ethics, effective September 15, 2021, p. 10, indicates an employee will not subject an inmate or any other person under the supervision of the Sheriff's Office to physical, sexual, or verbal abuse or harassment. The Georgetown County Detention Center uphold a zero tolerance towards any form of inmate sexual abuse and harassment, to include consensual sexual relations. All allegations of abuse /harassment or of consensual sexual relations will be immediately and formally investigated. Founded acts will subject the employee to disciplinary action up to and including immediate termination, to possible criminal prosecution, and to possible revocation of his /her licensure and certification.

During an interview with the Detention Center Director, it was confirmed in the previous twelve months there had not been any terminations or resignations of staff for violation of the agency's sexual abuse or sexual harassment or sexual misconduct policies.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 13, A, 2, states disciplinary sanctions for violations of agency policies relating to sexual abuse and harassment (other than actually engaging in sexual abuse) will be commensurate with the nature and circumstances of the acts committed; the employee's disciplinary history; and the sanctions imposed for comparable offenses by other employees with similar histories.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 101.0, Standards of Conduct and Ethics, effective September 15, 2021, p. 9, states an employee will not discuss personal or confidential Sheriff's Office or Detention Center matters with inmates as they may make that person believe they are being taken into the employee's confidence. Fraternalizing, sexually harassing, or engaging in sexual relationships with an inmate(s) is forbidden.

Violations will be investigated and founded violations will be met with disciplinary action up to and including immediate termination and to possible criminal prosecution.

During an interview with the Detention Center Director, it was confirmed in the previous twelve months there had not been any terminations or resignations of staff for violation of the agency's sexual abuse or sexual harassment or sexual misconduct policies.

Provision (d):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 13, A, 3, states all terminations for violations of sexual abuse or sexual harassment policies, or resignations by employees who would have been terminated if not for their resignation, will be reported to the applicable law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies (for individuals who may have specialized licenses, i.e., nurses, contractors, engineers, South Carolina professional standards agencies, etc.). In these cases, the PREA Coordinator will be responsible for making written notifications and for maintaining copies of all notifications for documentation and record keeping purposes.

During an interview with the Detention Center Director, it was confirmed in the previous twelve months there had not been any terminations or resignations of staff for violation of the agency's sexual abuse or sexual harassment or sexual misconduct policies.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding disciplinary sanctions for staff. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 106.0, Volunteers, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Detention Center Director

Provision (a)

The PAQ indicates there have been no GCDC contractors or volunteers who have been reported to licensing bodies or law enforcement during the past twelve months.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 106.0, Volunteers, effective January 1, 2018, p. 4, 6, C, indicates any volunteer found to have engaged in any sexual abuse act defined under Policy 108.0 – PREA will be immediately terminated and prohibited from providing continued services at the detention center. Officers assigned to the main entrance of the detention center will be immediately notified of the volunteer's termination and will be advised the volunteer is not approved for admission into the facility. The Detention Center Administrator and/or the PREA Coordinator will ensure the incident is appropriately investigated in accordance with the procedures outlined in Policy 108.0 – PREA. Depending upon the type of incident the volunteer was involved, he/she may be:

1. Reported for arrest and possible criminal prosecution;
2. Reported to any relevant licensure bodies for possible license revocation;
3. Referred for remedial action to the PREA Coordinator and possible reinstatement of volunteer privileges. Should remedial action be deemed relevant, the PREA Coordinator will develop a remedial action plan for submission to the Detention Center Administrator for final, written approval. The PREA Coordinator will be responsible for maintaining documentation as to the volunteer's successful completion of remedial action steps and for prohibiting reinstatement of the volunteer's privileges until all conditions are satisfactorily met.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 18, B, 1-3, indicate

1. Any contractor or volunteer who engages in sexual abuse will be immediately prohibited from any further contact with inmates and will be immediately reported to the relevant law enforcement agency(s), unless the activity was clearly not criminal, and to relevant licensing bodies, if applicable. Documentation of relevant reports will be maintained by the PREA Coordinator.
2. The PREA Coordinator and the Detention Center Director will, in consultation with the volunteer/contractor's supervisor, take appropriate remedial measures and consider whether to prohibit further contact with inmates in the case of any other violation of sexual abuse or sexual harassment policies by a contractor or volunteer.
3. The PREA Coordinator will be responsible for maintaining documentation related to all actions taken against contractors and volunteers for record keeping and reporting purposes.

Provision (b)

GCDC takes appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. There have been no cases of violations involving the agency's sexual abuse or sexual harassment policies by a contractor or volunteer. During the past twelve months there have been no reports of sexual abuse by contractors or volunteers at GCDC, and thus no instances of requiring remedial measures.

During an interview with the Detention Center Director, it was disclosed when an issue is brought to his attention, he

immediately refers the matter to the PCM. During this time, the contractor or volunteer are not allowed access to the facility pending investigation and review of the matter.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding corrective action for contractors and volunteers. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Detention Center Director
- Medical Staff

Provision (a)

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, states inmates will be disciplined and subject to sanctions pursuant to an administrative finding that the inmate engaged in inmate-inmate sexual abuse or following a criminal finding of guilt for inmate-inmate sexual abuse. Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

Provision (b)

Policy indicates sanctions shall be appropriate to the nature of abuse committed, the offender's disciplinary history, and the sanction imposed for comparable offenses by other offenders with similar histories.

During the interview with the Detention Center Director, disciplinary sanctions were discussed. He indicated that the inmate discipline is based on level of the violation and penalties are imposed comparable to other inmate's penalties. Penalties might include change of housing assignment, loss of good time credit, and possible prosecution, when appropriate.

Provision (c)

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, states for incidents involving sexual abuse, the Hearing Officer will consider whether an inmate's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed. The Hearing Officer may consider whether to require an inmate to participate in therapy, counseling or other interventions designed to correct underlying reasons or motivations for the abuse, if such programs or interventions are available.

During the interview with the Detention Center Director, disciplinary sanctions were discussed. He indicated if the inmate has a mental history, mental health staff will be involved to assist in determining appropriate sanctions.

Provision (d)

The PAQ indicates GCDC does offer therapeutic services and interventions to inmates.

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, states for incidents involving sexual abuse, the Hearing Officer will consider whether an inmate's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed. The Hearing Officer may consider whether to require an inmate to participate in therapy, counseling or other interventions designed to correct underlying reasons or motivations for the abuse, if such programs or interventions are available.

During interviews with medical staff, the Auditor was informed that medical staff can make recommendations for referrals for inmates for therapy, counseling, or other interventions to address underlying issues related to abuse. The inmate's issues would be addressed during regular counseling sessions or group counseling sessions. Participation in interventions is not a condition for access to other programming or benefits.

Provision (e)

The PAQ reflects GCDC only disciplines inmates for sexual contact with staff when it is determined the staff member did not

consent.

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, indicates an inmate may be disciplined for sexual contact with staff, only upon a finding that the staff member did not consent to such contact.

Provision (f)

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, indicates a report of sexual abuse made in good faith based upon a reasonable belief the alleged conduct occurred will not constitute falsely reporting an incident or lying about an incident, even if the investigation which follows does not substantiate the allegation.

During an interview process, the Auditor learned in the past twelve months there had not been any disciplinary action taken against any inmate(s) for a report of sexual abuse made in good faith.

Provision (g)

The PAQ indicates GCDC prohibits all sexual activity between inmates. Further, it states GCDC only considers sexual activity between inmates to be sexual abuse if it is coerced.

GCDC Policies and Procedures, Chapter 500: Inmate Discipline Policy 500.0, Inmate Discipline, effective January 1, 2018, p. 14, indicates inmates may be disciplined for sexual contact with other inmates; however, such behavior will not be classified as sexual abuse if the activity in question was consensual.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding disciplinary sanctions for inmates. No recommendations or corrective action.

115.81

**Medical and mental health screenings; history of sexual abuse**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Medical Staff

Provision (a)

The PAQ reflects that all GCDC inmates who disclosed prior victimization during screening are offered a follow-up meeting with a medical or mental health professional within 14 days of disclosure.

The PAQ reflects that in the past twelve months zero inmates disclosed prior victimization during screening.

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 3, 2, E, states consistent with PREA Standards, should the results of the form indicate an inmate may have previously perpetrated sexual abuse or been a victim of sexual abuse, the inmate must be scheduled to meet with the health care provider no later than 14 days after his/her admission. For any inmate whose results indicate they have previously perpetrated sexual abuse, the health care provider will offer the inmate the opportunity to meet with a mental health care practitioner. The meeting should take place within 14 days of the inmate's admission. (NOTE: Consistent with PREA Standards, any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health care professionals and other staff, as necessary, to inform treatment plans and security and management decisions related to such items as housing, bed assignment, work assignment, educational assignments, or other assignments required under federal, state or local statutes or regulations. Additionally, health care providers will be required to receive informed consent from inmates prior to reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.)

Intake staff indicated inmates are offered a follow-up meeting with a mental health professional, within 14-days of intake, if the intake screening indicates the inmate is at high risk for possible victimization, aggressiveness or has a past history of victimization.

Provision (b)

The PAQ reflects in the past twelve months, zero inmates disclosed having previously perpetrated sexual abuse

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 3, 2, E, states in part, for any inmate whose results indicate they have previously perpetrated sexual abuse, the health care provider will offer the inmate the opportunity to meet with a mental health care practitioner. The meeting should take place within 14 days of the inmate's admission.

Provision (c)

As stated in provision (a) and (b), if the intake screening indicates an offender has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure the offender is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

Provision (d)

The PAQ indicates all information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and those who need to make management, security, or treatment plan decisions.

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual

Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 3, 2, E, states in part, any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health care professionals and other staff, as necessary, to inform treatment plans and security and management decisions related to such items as housing, bed assignment, work assignment, educational assignments, or other assignments required under federal, state or local statutes or regulations.

The Auditor interviewed staff who conduct intake screenings and was informed that all medical and mental health records are contained in a separate and secure database. This database is accessed only through medical or mental health staff, and information is only provided to classification and high-level staff on a need-to-know basis.

Provision (e)

The PAQ indicates GCDC medical and mental health professionals obtain informed consent prior to reporting information about prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18.

GCDC Policies and Procedures, Chapter 200: Admission/Booking, Policy 204.0, Intake Screening for Risk of Sexual Victimization or Perpetration/Transgender Inmates, dated January 1, 2018, p. 3, 2, E, states in part, health care providers will be required to receive informed consent from inmates prior to reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.)

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding medical and mental health screenings, history of sexual abuse. No recommendations or corrective action.



**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Medical and Mental Health Staff

Provision (a)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, B, 1-3, states the GCDC will make every effort to enter into contracts with outside agencies trained to assess and provide counseling services for sexual abuse victims or will document that such services are available in-house by qualified staff through the contract health care provider. At a minimum, these services will include:

1. Mental health crisis intervention and treatment;
2. Social, family, and peer support; and
3. Medical treatment, including testing for HIV and other sexually transmitted diseases, emergency contraceptive and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate

All treatment services will be provided without cost to the victim, regardless of whether the victim names the perpetrator or cooperates with an investigation into the alleged sexual abuse.

Medical and mental health staff reported treatment is provided immediately and is based on their professional judgment. Medical and mental health staff work together to ensure the inmate received the appropriate treatment. Information about and access to emergency contraception and sexually transmitted diseases prophylaxis, is offered in accordance with professionally accepted standards of care and where medically appropriate.

The Auditor reviewed records of inmates who alleged sexual abuse and in each case the inmate was referred to medical and mental health well within the appropriate time frame.

Provision (b)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 15, E, 4, states health care providers responsible for the initial care of the inmate will assess the medical and mental health care needs of the victimized inmate. If the incident involved sexual abuse that occurred within a 72-hour period, the inmate will be offered a sexual abuse medical examination. Sexual abuse medical examinations will be conducted by an outside medical facility contracted to conduct sexual examinations utilizing Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, B, 3, states medical treatment, including testing for HIV and other sexually transmitted diseases, emergency contraceptive and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Through the interview process, medical staff reported that upon arriving at medical after a report of sexual assault, an inmate will get a cursory examination by the physician to provide feedback if the inmate should be immediately transported to a hospital due for a forensic examination. As part of the process, the inmate receives information about sexually transmitted infections, prophylaxis and other necessary care information.

Provision (d)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape

Elimination Act, effective January 1, 2018, p. 16, 11, B, indicates all treatment services will be provided without cost to the victim, regardless of whether the victim names the perpetrator or cooperates with an investigation into the alleged sexual abuse.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding access to emergency medical and mental health services. No recommendations or corrective action.

**115.83 Ongoing medical and mental health care for sexual abuse victims and abusers**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Medical and Mental Health Staff
- PREA Compliance Manager (PCM)

Provision (a)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, D, indicates GCDC will offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse while incarcerated in the Georgetown County Detention Center. The evaluation and treatment will, as appropriate, include the following services: follow-up services, treatment plans and, when necessary, referrals for continued care following their release from the detention center or transfer to or placement in other facilities.

The Auditor reviewed records, produced by the facility, documenting the community standard of care, the evidence of sexually transmitted infection testing, prophylaxis treatment, psychiatry and psychology services, crisis intervention. These services are free of charge to inmates regardless of whether the abuser is named or whether the inmate cooperates with an investigation.

Medical and mental health staff reported treatment is provided immediately and is based on their professional judgment. Medical and mental health staff work together to ensure the inmate received the appropriate treatment. Information about and access to emergency contraception and sexually transmitted diseases prophylaxis, is offered in accordance with professionally accepted standards of care and where medically appropriate.

Provision (b)

As stated in provision (a) 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

Documentation and records review supported attentiveness to follow-up services and treatment plans. The files demonstrated detailed and professional notes on the evaluations conducted by medical and mental health staff and their follow up appointments with inmates. Follow-up consisted of routine inmate visits with medical and mental health staff.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, B, states in part, to the extent possible, all services provided will be consistent with the community level of care.

Interviews with medical and mental health staff support compliance in the area of evaluation, follow-up, treatment plans and referral services. The statement of Medical and mental health staff reflects an active understanding of the importance of appropriate evaluation, follow up, treatment planning and service referral.

GCDC policy indicates inmate victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests.

Provision (d)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 11, E, states should an inmate be a victim of sexually abusive vaginal penetration while incarcerated, he/she will be offered pregnancy testing by the health care provider. Should pregnancy result from victimization, the victimized inmate will receive timely and comprehensive information about and access to all lawful pregnancy related medical services.

Provision (e)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 17, 11, E, states in part, should pregnancy result from victimization, the victimized inmate will receive timely and comprehensive information about and access to all lawful pregnancy related medical services.

Provision (f)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, B, 3, states medical treatment, including testing for HIV and other sexually transmitted diseases, emergency contraceptive and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Provision (g)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, b, states all treatment services will be provided without cost to the victim, regardless of whether the victim names the perpetrator or cooperates with an investigation into the alleged sexual abuse

During the interview process, the PCM confirmed all treatment services are provided to alleged victims without financial cost, regardless of whether the victim names the abuser or cooperated with any investigation arising out of the incident.

Provision (h)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, B, 1, states the GCDC will make every effort to enter into contracts with outside agencies trained to assess and provide counseling services for sexual abuse victims or will document that such services are available in-house by qualified staff through the contract health care provider. This includes, but is no limited to, mental health crisis intervention and treatment.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 16, 11, D, states GCDC will offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse while incarcerated in the Georgetown County Detention Center. The evaluation and treatment will, as appropriate, include the following services: follow-up services, treatment plans and, when necessary, referrals for continued care following their release from the detention center or transfer to or placement in other facilities.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding ongoing medical and mental health care for sexual abuse victims. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018

Interviews:

- Detention Center Director
- PREA Compliance Manager (PCM)
- Incident review Team (IRT)

Provision (a)

The PAQ reflects in the past twelve months there were 2 criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p.18, 14, A, indicates consistent with the requirements contained in PREA Standards 115.86(a) - (e), the Detention Center Director will ensure that a Sexual Abuse Incident Review Team is established to review all substantiated and unsubstantiated allegations of sexual abuse or harassment. The Team will be required to review incidents within 30 days of the conclusion of the investigation and prepare a report of its findings and any recommendations for improvement for submission to the Detention Center Director and the PREA Coordinator. Allegations deemed unfounded upon investigation will not be required to be reviewed by the Team.

Provision (b)

The PAQ reflects in the past twelve months, there were 2 criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 18, 14, B indicates the Review Team will include upper-management level employees, with input from shift supervisors, investigators, and medical or mental health care professionals. Allegations deemed unfounded upon investigation will not be required to be reviewed by the Team.

The PC confirmed during the past 12-months there have been a total of four cases. All cases were sexual abuse allegations. Two were inmate-on-inmate and two were staff-on-inmate. After being thoroughly investigated, one staff-on-inmate was deemed unfounded and the other was deemed unsubstantiated. The unsubstantiated staff-on-inmate case was referred for prosecutorial review, but prosecution was declined. After being thoroughly investigated, both inmate-on-inmate cases were deemed unsubstantiated. All cases have been closed. Sexual abuse incident reviews were conducted on the three unsubstantiated cases.

Provision (c)

In the interview with the Detention Center Director, he confirmed his understanding of the composition of the review team and his willingness to consider and incorporated recommendations from team members.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 18, 14, B, indicates the Review Team will include upper-management level employees, with input from shift supervisors, investigators, and medical or mental health care professionals.

In the interview with the Detention Center Director, he confirmed his understanding of the composition of the incident review team and his willingness to consider and incorporated recommendations from team members.

Provision (d):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 18, 14, C, indicates at a minimum, the Review Team will be responsible for:

1. Considering whether the allegation or investigation indicates a need to change policies and practices to better prevent, detect, or respond to sexual abuse;
2. Considering whether the incident or allegation was motivated by race; ethnicity; gender identity, lesbian, gay, bisexual, or intersex identification status or perceived status; gang affiliation; or by other factors or group dynamics at the facility;
3. Examining the area of the facility where the incident allegedly occurred to determine if any physical barriers existed which may have enabled the abuse;
4. Assessing the adequacy of staffing levels of the areas during different shifts;
5. Assessing whether monitoring technology should be deployed or augmented to supplement supervision by officers.

Provision (e):

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 18, 14, C, indicates to the extent possible, the Detention Center Director and the PREA Coordinator will implement the recommendations of the Review Team. Should the Detention Center Director and/or the PREA Coordinator be unable to implement the recommendations of the Review Team, they will document the reasons for not doing so. All documentation will be maintained by the PREA Coordinator for record keeping and reporting purposes. (Documentation may include requests for funding made for new equipment, staffing or renovations that were disapproved by funding authorities, or other requests for outside assistance that were denied.)

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding sexual abuse incident reviews. No recommendations or corrective action.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- Annual PREA Report 2020

Interviews:

- PREA Coordinator

Provision (a)

According to the PAQ, the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, E, states The PREA Coordinator will collect and maintain uniform data for every allegation of sexual abuse at the Georgetown County Detention Center. At a minimum, the data collected will be sufficient to address all the questions presented in the Survey of Sexual Violence conducted by the Department of Justice and sent to facilities on a recurring basis. Data may be collected, reviewed and maintained from all available reports, investigations, and sexual abuse incident reviews.

A review of the 2020 annual PREA report, confirms this provision has been met.

Provision (b)

According to the PAQ the agency aggregates the incident-based sexual abuse data at least annually.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 14, 1, F, states The PREA Coordinator will review data collected in order to assess and improve the effectiveness of the detention center's sexual abuse prevention, detection, and response plans, policies, and training and prepare annual reports of all recommendations and corrective action plans for presentation to the Detention Center Director and other identified stakeholders. Upon approval of such reports by the Detention Center Director or designee, make this information available to the public for review either via website or by other means.

Provision (c)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, B, states the PREA coordinator will collect, maintain and report statistics and information related to PREA incidents, programs, and activities, to include documentation and data related to corrective action plans as required under the PREA Standards 115.87(a) - (f) and 115.88(a) - (d) and 115.89(a) -(d).

Provision (d):

According to the PAQ, the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, E, states the PREA Coordinator will collect and maintain uniform data for every allegation of sexual abuse at the Georgetown County Detention Center. At a minimum, the data collected will be sufficient to address all the questions presented in the Survey of Sexual Violence conducted by the Department of Justice and sent to facilities on a recurring basis. Data may be collected, reviewed and maintained from all available reports, investigations, and sexual abuse incident reviews.

Provision (e):

N/A – GCDC does not contract for the confinement of its inmates. Therefore, this provision does not apply.

Provision (f):

N/A – The Department of Justice has not requested the agency provide all data from the previous year. If the data were requested GCDC would provide the data requested by the deadline set forth in this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding data collection. No recommendations or corrective action.



**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documentation Reviewed:

- Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation
- GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018
- Annual PREA Report 2020

Interviews:

- Detention Center Director
- PREA Compliance Manager

Provision (a)

According to the PAQ, the agency reviews data collected and aggregated pursuant to §115.87 to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies.

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, B, indicates the PREA Coordinator will collect, maintain and report statistics and information related to PREA incidents, programs, and activities, to include documentation and data related to corrective action plans as required under the PREA Standards 115.87(a) - (f) and 115.88(a) - (d) and 115.89(a) -(d)

GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, F, indicates the PREA Coordinator will review data collected in order to assess and improve the effectiveness of the detention center's sexual abuse prevention, detection, and response plans, policies, and training and prepare annual reports of all recommendations and corrective action plans for presentation to the Detention Center Director and other identified stakeholders. Upon approval of such reports by the Detention Center Director or designee, make this information available to the public for review either via website or by other means.

As part of the interview with the PCM, the Auditor learned the agency reviews data collected pursuant to §115.87 and assesses the effectiveness of the sexual abuse prevention, detection and response policies, practices, and training. The agency prepares an annual report and posts the information on the website. The Auditor also learned that all personally identifying information, if any, is completely redacted.

The Detention Center Director asserts if the incident-based sexual abuse data shows patterns, such as LGBTI inmates are being targeted or a significant number of assaults occurring in a particular area of an institution, then policies, procedures or training may be modified.

Provision (b)

Through the interview process, the Auditor learned GCDC reviews data collected to assess and improve the effectiveness of the sexual abuse prevention, detection and response policies, procedures and training by; identifying problematic issues; taking corrective action on an ongoing basis; and preparing annual reports of findings and corrective action, if applicable.

The Auditor reviewed the most recent annual report (2020) and found it to follow the PREA standards, including a comparison to the findings in previous reports to assess progress in addressing sexual abuse.

Provision (c)

This provision is addresses in provision (a) and (b).

According to the interview with the Detention Center Director, he reviews all PREA Annual Reports. He reviews the annual report for the prior calendar year before placement on the agency website.

As required by standard, the GCDC places all annual reports on its website, accessible for public view <http://www.gcsheriff.org/enforcement-division/detention-center/prea/> allows access to the GCDC PREA webpage, which contains the most recent (2020) annual report.

Provision (d):

According to the PAQ, the annual report is written without personal identifying information (PII). However, if PII is in the report, it would be redacted prior to be published on the agency website. Additionally, the agency does have the ability to make any changes that are required.

The PCM indicated the agency reviews data collected pursuant to §115.87. The annual report is written without PII and in the event PII is included, it is redacted prior to publishing on the agency website.

The PCM indicated the PC is responsible for ensuring the information is provided for purposes of agency reporting.

During an interview with the PCM, she indicated they ensure the data collected on sexual abuse for inmate-on-inmate cases is forwarded to the PREA Coordinator annually.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding data review for corrective action. No recommendations or corrective action.

115.89	<b>Data storage, publication, and destruction</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li>· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li>· Annual PREA Report 2020</li> <li>· GCDC publicly accessible website <a href="http://www.gcsheriff.org/enforcement-division/detention-center/prea/">http://www.gcsheriff.org/enforcement-division/detention-center/prea/</a></li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>· PREA Coordinator (PC)</li> </ul> <p>Provision (a)</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4 outlines in part:</p> <ul style="list-style-type: none"> <li>· Accurate, uniform data shall be collected for every incident of sexual abuse alleged to have occurred at a GCDC using a standardized instrument and set of definitions.</li> <li>· Incident-based sexual abuse data shall be aggregated at least annually.</li> <li>· The incident-based data collected shall include, at a minimum, information necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.</li> <li>· All available incident-based documents, including reports, investigation files, and sexual abuse incident reviews shall be maintained, reviewed, and collected as needed to complete the SSV.</li> </ul> <p>Through the interview process, the Auditor learned there are several locations where the GCDC retains data. At the local level, data is retained within a secure system and access to the system is limited to those staff with a need to know. Additional data is retained at the Agency level as required for completion of the SSV-2, and also within the GCDC website for public access.</p> <p>Provision (b)</p> <p>The GCDC Webpage provides reports relative to sexual abuse data and can be accessed at <a href="http://www.gcsheriff.org/enforcement-division/detention-center/prea/">http://www.gcsheriff.org/enforcement-division/detention-center/prea/</a></p> <p>Provision (c)</p> <p>During an interview with the PC, the Auditor was made aware the department reviews data collected pursuant to §115.87, and that reports are written in such a way that no information has to be redacted. The department report reviewed by the Auditor met PREA compliance standards.</p> <p>Provision (d):</p> <p>GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018, p. 4, 1, G, indicates GCDC will maintain all collected data related to sexual abuse incidents, recommendations and corrective action plans for at least ten (10) years.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding data storage, publication and destruction. No recommendations or corrective action.</p>

115.401	Frequency and scope of audits
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 509 297">Documentation Reviewed:</p> <ul data-bbox="240 327 1477 506" style="list-style-type: none"> <li data-bbox="240 327 1385 353">· Georgetown Count Detention Center (GCDC) Pre-Audit Questionnaire (PAQ) and supporting documentation</li> <li data-bbox="240 383 1477 450">· GCDC Policies and Procedures, Chapter 100: Agency Administration, Management and Training Policy 108.0, Prison Rape Elimination Act, effective January 1, 2018</li> <li data-bbox="240 479 1366 506">· GCDC publicly accessible website <a href="https://www.gcsheriff.org/enforcement-division/detention-center/prea/p">https://www.gcsheriff.org/enforcement-division/detention-center/prea/p</a></li> </ul> <p data-bbox="240 535 352 562">Interviews:</p> <ul data-bbox="240 591 563 680" style="list-style-type: none"> <li data-bbox="240 591 563 618">· Detention Center Director</li> <li data-bbox="240 647 544 674">· PREA Coordinator (PC)</li> </ul> <p data-bbox="240 703 379 730">Provision (a):</p> <p data-bbox="240 763 1477 831">The Detention Center Director reported the facility was last audited in 2019. A copy of the 2019 audit report is on the GCDC website for public information and review.</p> <p data-bbox="240 860 919 909"><a href="https://www.gcsheriff.org/enforcement-division/detention-center/prea/">https://www.gcsheriff.org/enforcement-division/detention-center/prea/</a></p> <p data-bbox="240 943 379 969">Provision (b):</p> <p data-bbox="240 1003 1457 1070">During an interview with the PC, the Auditor learned the audit for GCDC was in the third year of audit cycle 3. The GCDC webpage provides reports relative to sexual abuse data from the various facilities in accordance with PREA standards.</p> <p data-bbox="240 1099 379 1126">Provision (c):</p> <p data-bbox="240 1155 284 1182">N/A</p> <p data-bbox="240 1211 379 1238">Provision (d):</p> <p data-bbox="240 1267 284 1294">N/A</p> <p data-bbox="240 1323 379 1350">Provision (e):</p> <p data-bbox="240 1379 284 1406">N/A</p> <p data-bbox="240 1435 379 1462">Provision (f):</p> <p data-bbox="240 1491 284 1518">N/A</p> <p data-bbox="240 1547 379 1574">Provision (g):</p> <p data-bbox="240 1603 284 1630">N/A</p> <p data-bbox="240 1659 379 1686">Provision (h):</p> <p data-bbox="240 1720 1477 1821">During the on-site portion of the audit, the Auditor had complete, unimpeded access to every area of the facility. Throughout the on-site portion of the audit the PCM and a Captain were available to accompany the auditor and give her complete access to any part of the facility she requested to see.</p> <p data-bbox="240 1850 379 1877">Provision (i):</p> <p data-bbox="240 1910 1477 1977">At all times throughout the audit process, GCDC provided the Auditor with all requested information in a timely and complete manner.</p> <p data-bbox="240 2007 379 2033">Provision (j):</p> <p data-bbox="240 2063 284 2089">N/A</p> <p data-bbox="240 2119 379 2145">Provision (k):</p>

N/A

Provision (l):

N/A

Provision (m):

The Auditor was provided a secure, private space to conduct all interviews during the on-site portion of the audit.

Provision (n):

During inmate interviews, all inmates reported they were provided the opportunity to send out confidential mail or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.

Provision (o):

N/A

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard frequency and scope of audits. No recommendations or corrective action.

115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Documentation Reviewed:</p> <ul style="list-style-type: none"> <li>· GCDC publicly accessible website</li> </ul> <p><a href="https://www.gcsheriff.org/enforcement-division/detention-center/prea/">https://www.gcsheriff.org/enforcement-division/detention-center/prea/</a></p> <p>Provision (f):</p> <p>The GCDC webpage provides multiple reports relative to sexual abuse data in accordance with PREA standards. Data can be accessed at:</p> <p><a href="https://www.gcsheriff.org/enforcement-division/detention-center/prea/">https://www.gcsheriff.org/enforcement-division/detention-center/prea/</a></p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the GCDC meets every provision of the standard regarding audit contents and findings. No recommendations or corrective action.</p>

<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.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need 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.)	yes
<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes



<b>115.13 (d)</b>	<b>Supervision and monitoring</b>	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes
<b>115.14 (a)</b>	<b>Youthful inmates</b>	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (b)</b>	<b>Youthful inmates</b>	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.14 (c)</b>	<b>Youthful inmates</b>	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
<b>115.15 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.15 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	<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.)	na
<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.)	yes
<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.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.41 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

<b>115.41 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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.)	na
	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.)	na
	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.)	na
<b>115.43 (c)</b>	<b>Protective Custody</b>	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d)</b>	<b>Protective Custody</b>	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e)</b>	<b>Protective Custody</b>	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

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

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

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
<b>115.73 (c)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (d)</b>	<b>Reporting to inmates</b>	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.77 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
<b>115.78 (a)</b>	<b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.78 (b)</b>	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
<b>115.78 (c)</b>	<b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	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.)	yes
<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.)	yes
<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na

<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

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