PREA Facility Audit Report: Final

Name of Facility: Iowa Correctional Institution for Women

Facility Type: Prison / Jail

Date Interim Report Submitted: NA
Date Final Report Submitted: 07/21/2022

Auditor Certification		
The contents of this report are accurate to the best of my knowledge.		
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.		V
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.		V
Auditor Full Name as Signed: Karen d. Murray Date of Signature: 07/21/2022		

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	06/14/2022
End Date of On-Site Audit:	06/16/2022

FACILITY INFORMATION	
Facility name:	Iowa Correctional Institution for Women
Facility physical address:	420 Mill Street SW, Mitchellville, Iowa - 50169
Facility mailing address:	

Primary Contact	
Name:	David Southwick
Email Address:	David.Southwick@Iowa.gov
Telephone Number:	515-725-5038

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheryl Dahm
Email Address:	Sheryl.Dahm@lowa.gov
Telephone Number:	515-725-5007

Facility PREA Compliance Manager	
Name:	Amy Owen
Email Address:	amy.owen@iowa.gov
Telephone Number:	
Name:	David Southwick
Email Address:	david.southwick@iowa.gov
Telephone Number:	O: 515-725-5042

Facility Health Service Administrator On-site	
Name:	Kerri Hunter
Email Address:	Kerri.Hunter@lowa.gov
Telephone Number:	515-725-5235

Facility Characteristics		
Designed facility capacity:	888	
Current population of facility:	568	
Average daily population for the past 12 months:	654	
Has the facility been over capacity at any point in the past 12 months?	No	
Which population(s) does the facility hold?	Females	
Age range of population:	19-65 years of age	
Facility security levels/inmate custody levels:	Minimum Live Out through Maximum Custody	
Does the facility hold youthful inmates?	No	
Number of staff currently employed at the facility who may have contact with inmates:	197	
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	1	
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	43	

AGENCY INFORMATION			
Name of agency:	Iowa Department of Corrections		
Governing authority or parent agency (if applicable):			
Physical Address:	510 East 12th Street, Des Moines,	, Iowa - 50319	
Mailing Address:			
Telephone number:			
Agency Chief Executive Offi	cer Information:		
	Name:		
	Email Address:		
Telephone Number:			
Agency-Wide PREA Coordinator Information			
Name:	Rebecca Bowker	Email Address:	rebecca.bowker@iowa.gov
SUMMARY OF AUDIT FINDIN	NGS		
The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.			
Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.			
Number of standards exceeded:			
0			
Number of standards met:			
45			
Number of standards not met:			
0			

POST-AUDIT REPORTING INFORMATION GENERAL AUDIT INFORMATION **On-site Audit Dates** 1. Start date of the onsite portion of the audit: 2022-06-14 2. End date of the onsite portion of the audit: 2022-06-16 Outreach Yes 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 O No conditions in the facility? a. Identify the community-based organization(s) or victim On 5.14.2022 at 2:50 pm, this Auditor contacted Polk County Crisis advocates with whom you communicated: and Advocacy Services at 2309 Euclid Avenue, Des Moines, IA 50310, phone number 515.286.3600. After proper introductions and the reason for the call, the operator stated she worked for the statewide hotline and the Crisis center calls rolls to the Statewide hotline number during off hours. The operator stated if a resident were to call the center they would just need their name and a good call back number and they would get an advocate in touch with the advocate. AUDITED FACILITY INFORMATION 14. Designated facility capacity: 888 654 15. Average daily population for the past 12 months: 16. Number of inmate/resident/detainee housing units: 3 17. Does the facility ever hold youthful inmates or Yes youthful/juvenile detainees? No O 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 702 the facility as of the first day of onsite portion of the audit: 38. Enter the total number of inmates/residents/detainees with 7 a physical disability in the facility as of the first day of the onsite portion of the audit:

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:	0	
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:	0	
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:	2	
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:	23	
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:	4	
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:	1	
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:	1	
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):	No text provided.	
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit		
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:	197	
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:	43	
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:	1	

in the facility as of the first day of the onsite portion of the audit:		
INTERVIEWS		
Inmate/Resident/Detainee Interviews		
Random Inmate/Resident/Detainee Interviews		
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	15	
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	 ✓ Age ✓ Race ✓ Ethnicity (e.g., Hispanic, Non-Hispanic) ✓ Length of time in the facility ✓ Housing assignment ☐ Gender ☐ Other ☐ None 	
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility provided an incarcerated individual roster by housing unit to include those individuals who met targeted status. Once on the living units, individuals were chosen from the list who were on the unit, during the tour, by the auditor, in random order of every third individual.	
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	⊙ Yes ⊙ No	
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.	
Targeted Inmate/Resident/Detainee Interviews		
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	17	
A CONTRACTOR OF THE PROPERTY O	and the state of t	

No text provided.

52. Provide any additional comments regarding the population

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".

60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	 ✓ 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. ☐ The inmates/residents/detainees in this targeted category
	declined to be interviewed.
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).	Through the facility tour, interviews with staff and incarcerated individuals and their file review, this category of the targeted population was not apparent.
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	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.
	☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	Through the facility tour, interviews with staff and incarcerated individuals and their file review, this category of the targeted population was not apparent.
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	6

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:	2
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:	3
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:	1
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:	1
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
Random Staff Interviews 71. Enter the total number of RANDOM STAFF who were interviewed:	12
71. Enter the total number of RANDOM STAFF who were	☐ Length of tenure in the facility ☐ Shift assignment ☐ Work assignment ☐ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
71. Enter the total number of RANDOM STAFF who were interviewed: 72. Select which characteristics you considered when you	 ✓ Length of tenure in the facility ✓ Shift assignment ✓ Work assignment ✓ Rank (or equivalent) Other (e.g., gender, race, ethnicity, languages spoken)
71. Enter the total number of RANDOM STAFF who were interviewed: 72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply) 73. Were you able to conduct the minimum number of	 ✓ Length of tenure in the facility ✓ Shift assignment ✓ Work assignment ✓ Rank (or equivalent) Other (e.g., gender, race, ethnicity, languages spoken) None ✓ Yes

Staff in some facilities may be responsible for more than one of the sp apply to an interview with a single staff member and that information w	ecialized staff duties. Therefore, more than one interview protocol may rould satisfy multiple specialized staff interview requirements.
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	17
76. Were you able to interview the Agency Head?	• Yes • No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	 Yes No
78. Were you able to interview the PREA Coordinator?	♥ Yes♥ No
79. Were you able to interview the PREA Compliance Manager?	 Yes No NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply) 81. Did you interview VOLUNTEEPS who may have contact.	✓ Agency contract administrator ✓ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☐ Line staff who supervise youthful inmates (if applicable) ✓ Education and program staff who work with youthful inmates (if applicable) ✓ Medical staff ✓ Mental health staff ☐ Non-medical staff involved in cross-gender strip or visual searches ✓ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ✓ Investigative staff responsible for conducting administrative investigations ✓ Investigative staff responsible for conducting criminal investigations ✓ Staff who perform screening for risk of victimization and abusiveness ✓ Staff who supervise inmates in segregated housing/residents in isolation ✓ Staff on the sexual abuse incident review team ✓ Designated staff member charged with monitoring retaliation ☐ First responders, both security and non-security staff ✓ Intake staff ☐ Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	C Yes⊙ No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	♥ Yes♥ No
a. Enter the total number of CONTRACTORS who were interviewed:	1

b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all	☐ Security/detention
that apply)	Education/programming
	☐ Medical/dental
	☐ Food service
	☐ Maintenance/construction
	☐ Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.
SITE REVIEW AND DOCUMENTA	TION SAMPLING
Site Review	
PREA Standard 115.401 (h) states, "The auditor shall have access to, the requirements in this Standard, the site review portion of the onsite site review is not a casual tour of the facility. It is an active, inquiring p whether, and the extent to which, the audited facility's practices demonthe site review, you must document your tests of critical functions, impidentified with facility practices. The information you collect through the your compliance determinations and will be needed to complete your access to the review portion of the onsite site review.	audit must include a thorough examination of the entire facility. The rocess that includes talking with staff and inmates to determine astrate compliance with the Standards. Note: As you are conducting ortant information gathered through observations, and any issues a site review is a crucial part of the evidence you will analyze as part of
84. Did you have access to all areas of the facility?	• Yes
	C No
Was the site review an active, inquiring process that incl	uded the following:
85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	 Yes No
86. Tests of all critical functions in the facility in accordance	• Yes
with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	○ No
87. Informal conversations with inmates/residents/detainees	• Yes
during the site review (encouraged, not required)?	C No
88. Informal conversations with staff during the site review	• Yes
(encouraged, not required)?	C No
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).	No text provided.
Documentation Sampling	

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91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
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
auditors must self-select for review a representative sample of each type	

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records;

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	9	0	9	0
Staff-on-inmate sexual abuse	1	0	1	0
Total	10	0	10	0

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	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	15	0	15	0
Staff-on-inmate sexual harassment	0	0	15	0
Total	15	0	15	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	2	4	3
Staff-on-inmate sexual abuse	0	0	0	1
Total	0	2	4	4

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 detained sexual harassment investigation files, as applicable to the facility type being audited.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	12	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	12	3	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:	2
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	YesNoNA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	 Yes No 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?	 Yes No NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
	· ,
Staff-on-inmate sexual abuse investigation files	,
Staff-on-inmate sexual abuse investigation files 103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
103. Enter the total number of STAFF-ON-INMATE SEXUAL	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled: 104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE	1 C Yes No No NA (NA if you were unable to review any staff-on-inmate sexual
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled: 104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations? 105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE	1 O Yes No NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) Yes No NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	 Yes No NA (NA if you were unable to review any sexual harassment investigation files) 		
Inmate-on-inmate sexual harassment investigation files			
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0		
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	 Yes No NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) 		
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	C Yes No NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)		
Staff-on-inmate sexual harassment investigation files			
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0		
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	C Yes No NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)		
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	C Yes No NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)		
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.		
SUPPORT STAFF INFORMATION			
DOJ-certified PREA Auditors Support Staff			

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	• Yes • No		
a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:	1		
Non-certified Support Staff			
116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes○ No		
AUDITING ARRANGEMENTS AND COMPENSATION			
121. Who paid you to conduct this audit?	 The audited facility or its parent agency My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) A third-party auditing entity (e.g., accreditation body, consulting firm) Other 		
Identify the name of the third-party auditing entity	Kendra Prisk		

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.

Zero tolerance of sexual abuse and	u sexual harassment, FRLA coordinator	
Auditor Overall Determination: Meets S	Standard	
Auditor Discussion		

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, PREA-01, Incarcerated Individual PREA Information, dated August 2021
- 3. Iowa Department of Corrections Central Office Organizational Chart, dated 10.26.2021
- 4. Table of Organization, not dated

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors
- 4. Supervisory staff
- 5. PREA Compliance Manager

Interviews:

Through interviews with incarcerated individuals and staff and review of inmate and staff files, it is evident that this facility interweaves requirements for this standard in their daily protocols. Both incarcerated individuals and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. The PREA Compliance Manager did not attest to having the required time to institute and implement PREA protocols. The PREA Compliance Manager stated the facility is now hiring one individual to institute and implement PREA protocols and that position will have the required time needed for continued PREA implementation.

Site Review Observation:

During the tour of the facility, the Auditor witnessed postings of Zero Tolerance and Victim Services flyers. Third-party information was posted in the visitation area. The visitation area also had restrooms for visitors only and those doors were locked during visits. The facility has 'Scan Points' where staff must place their badge on each scan point to document rounds have been completed.

(a) Iowa Correctional Institution for Women PAQ states the agency policy mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, PREA-01, Incarcerated Individual PREA Information, page 1, section I. Purpose, states, "To inform incarcerated individuals of Iowa Department of Corrections' (IDOC) zero tolerance standard for unwanted sexual behavior and to provide incarcerated individuals with information relative to their rights and responsibilities under the Prison Rape Elimination Act."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, PREA-01, Incarcerated Individual PREA Information, page 1, section II. Policy, states, "It is the policy of the IDOC to provide a safe, humane, and secure environment, free from the threat of unwanted sexual behavior for all incarcerated individuals in all IDOC facilities. The IDOC prohibits sexual abuse and sexual harassment of incarcerated individuals through incarcerated individual orientation, screening, assessment, classification, monitoring, counseling, and investigation of alleged sexual violence. The IDOC has a "zero tolerance" position for sexual abuse and sexual harassment of all incarcerated individuals under correctional supervision whether in intuitional, residential, parole, probation and work release status. This policy shall be available to all incarcerated individuals and unless updates are needed this policy shall be reviewed every three years."

- (b) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, PREA-01, Incarcerated Individual PREA Information, page 5, section B. 2., Purpose, states, "The Deputy Director of Institution Operations shall be responsible for the development, implementation, and oversight of IDOC's efforts to comply with the PREA standards and to manage all PREA investigations."
- (c) Iowa Correctional Institution for Women PAQ states the agency PREA Coordinator, Executive Officer, reports to the Warden. The primary PREA Compliance Manager reports directly to the Warden. The backup PREA Compliance Manager reports to the Deputy Warden.

The facility provided an Iowa Department of Corrections – Central Office Organizational Chart, The Organizational Chart demonstrates the Executive Officer reports to the facility Warden.

The facility provided a Table of Organization, demonstrating the hierarchy for a facility. This organizational chart demonstrates the PREA Office Manager reports to the Associate Warden of Administration who reports directly to the Warden.

Through such reviews, the facility meets the standard requirements

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Iowa Correctional Institution for Women PAQ
	Interviews:
	1. PREA Compliance Coordinator
	During the pre-audit phase, the PREA Coordinator, per the agency PAQ, conveys the agency has no privatized contracts.
	(a) The Iowa Correctional Institution for Women PAQ states the facility has zero contracts with private agencies for confinement services of their inmates.
	Through such reviews, the facility meets the standard requirements

115.13 Supervision and monitoring

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-PR-03. dated June 2021
- 3. State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Management of the Security Program, Policy IO-SC-01, dated November 2021
- 4. Iowa Correctional Institution for Women, PREA Compliance Staffing Plan, dated 2022
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Management of Security Program, Policy IO-SC-01, dated September 2021
- 6. Housing Rounds History Reports, dated 10.30.2021, 11.8.2021, 12.21.2021, 1.14.2022
- 7. Supervisory Housing Rounds History Report, dated 1.28.2022, 1.31.2022

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors
- 4. Captain
- 5. PREA Compliance Manager

Incarcerated individuals attested to seeing and having access to supervisory staff throughout the day and being able to speak with them when they made their rounds.

Staff interviewed could attest to supervisory staff conducting unannounced rounds, each day, at different times. Supervisors attested to completing unannounced rounds in all areas of the facility. The Captain stated rounds are documented by scanning scan points throughout the facility.

Site review observation:

Unannounced rounds documentation is demonstrated by accessing the facility scan points database. Rounds are shown several times per day/week/month for supervisory staff.

Recommendations:

The following recommendations were provided to administration:

- The facility elevator is equipped with a cameral; however, during the tour of the facility we witnessed several incarcerated individuals exiting the elevator, without staff in their presence. The Auditor recommended an activity detection on cameras be implemented when in the elevator is in use by incarcerated individuals unaccompanied by stall.
- Facility grounds demonstrates a garage is in use by both staff and incarcerated individuals who maintain facility vehicles. The Auditor recommended an activity detection system is implemented for all entry and exit times to the facility garage.
- The R&D area be complemented with mirrors in corners in order for staff to view incarcerated individuals working in the back of the room where blind spots are apparent.

School (All buildings):

- Doors be closed and locked when not in use.
- · Window blinds be pulled up at least 6" to provide a visual of the inside of rooms/offices/classes.
- Relocate televisions from window area of classrooms in order to provide a visual of the inside of the classroom.

Gvmnasium:

Resident sewing room in back closet be relocated back to the music room and or a location in line of sight of staff and or cameras.

Kitchen:

- Incarcerated individual restroom partition wall to be reduced in height as the current screen creates room for possible incidents of sexual misconduct and or abuse.
- Freezer and refrigerator lights be left on when incarcerated individuals are working in the kitchen to mitigate possible incidents of sexual misconduct, abuse and or other incidents between residents and or staff and residents.
- (a) The lowa Correctional Institution for Women PAQ states the agency requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against abuse. The daily number of inmates, based on the facility website on August 20, 2021, is 654 with the capacity of 654 and the staffing plan was predicated.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-PR-03, page 1-2, section Policy, states, "It is the policy of the IDOC to have an orderly system for establishing, reviewing, and revising the staffing requirements of each correctional institution, so as to effectively meet the specific programs, services, and security needs of the incarcerated individual population at each location."

The facility provided a PREA Assessment Information, Iowa State Penitentiary, Iowa Department of Corrections. The staffing plan includes the following components.

- American Correctional Association Standards and general accepted detention and correctional practices were used to program, design and build the facility.
- · No judicial findings of inadequacy
- · Other oversight by Federal investigative agencies when the facility was constructed and the same is true today.
- No findings of inadequacy from internal or external agencies.
- · Subsequent pages include physical plant layout.
- · Inmate populations and demographics
- Supervisory personal distribution
- Educational programming
- Subsequent sexual harassment and sexual abuse investigations
- · Housing/Living Units with description of Pod populations contained in each to include staffing in each building.
- (b) The lowa Correctional Institution for Women PAQ states each time the staffing plan is not complied with, the facility does document and or justifies deviations. The PAQ states the facility has not deviated from the staffing plan in the past 12 months. The PAQ states the facility has not had a deviation from the staffing plan.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-PR-03, page 2, section 2., states, "In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan. These documented deviations and justifications shall be sent to the Deputy Director of Institution Operations for review."

- (c) The lowa Correctional Institution for Women PAQ states at least once every year the facility/agency, in collaboration with the PREA coordinator, does review the staffing plan to whether adjustments are needed in (a) the staffing, (b) the deployment of monitoring technology, or (c) the allocation of agency/facility resources to commit to the staffing plan to ensure compliance with the staffing plan.
- (d) The Iowa Correctional Institution for Women PAQ states facility requires that intermediate level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Management of Security Program, Policy IO-SC-01, page 3, section C. 2, states, "The Shift Supervisors or designated alternate supervisor shall tour every main living unit of the institution at least once each shift. Satellite living units such as minimum live out sites shall be routinely inspected by supervisory staff at least weekly. The Associate Warden of Security shall routinely review logs and other documentation of such tours. Unoccupied areas may be inspected on a weekly basis. Each agency shall have a policy to prohibit 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. Shift Supervisors will complete rounds using PDA's."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Management of Security Program, Policy IO-SC-01, page 3, section C. 6, states, "Routine inspection of the institution by management staff is an important component of institutional operations. The Warden, Deputy Warden Associate Warden/Security shall routinely make rounds of the facility with a goal of visiting each major area of the facility monthly. The assigned Duty Officer shall inspect all areas of the facility during the assigned Duty Week. Department Heads shall routinely make rounds of their areas of responsibility and, occasionally, all areas of the facility. Each agency operating a facility shall implement 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. Such policy and practice shall be implemented for night shift as well as day shifts."

The facility provided:

- Housing Rounds History Reports, dated 10.30.2021, 11.8.2021, 12.21.2021, 1.14.2022
- Supervisory Housing Rounds History Report, dated 1.28.2022, 1.31.2022
- a. Reports include information on:
- i. Region / Facility
- ii. Housing Units / Locations
- iii. Staff performing
- iv. Start and End dates
- v. Supervisor
- vi. Entry type: (Handheld Manual, Handheld Scan, ICON
- vii. Individual supervisor round checks with date of round, location and title

Through such reviews, the facility meets the standard requirements

115.14 Youthful inmates Auditor Overall Determination: Meets Standard **Auditor Discussion** Document Review: 1. Iowa Correctional Institution for Women PAQ 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Youthful Incarcerated Individuals, Policy IC-CL-07, dated June 2021 Interviews: PREA Compliance Manager The PAQ provided by the facility stated this facility did not house youthful incarcerated individuals. Discussions with the PREA Compliance Manager demonstrated youthful incarcerated individuals were not housed at this facility. Site Review Observation: The facility tour and formal and informal interviews with incarcerated individuals and staff demonstrated youthful incarnated individuals were not housed at the facility. (a-d) The Iowa Correctional Institution for Women PAQ states the agency does not house youthful inmates. The facility has not had a youthful inmate since 2019. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Youthful Incarcerated Individuals, Policy IC-CL-07, page 3, section B. 1-5, state, "Youthful Incarcerated Individual Operations 1. A youthful incarcerated individual shall not be placed in a housing unit in which the youthful incarcerated individual will have sight, sound, or physical contact with any adult incarcerated individual through use of a shared dayroom or other common space, shower area, or sleeping quarters. 2. Exceptions to #1 above may be authorized by the Warden in exigent circumstances and communicated to the Deputy Director of Institution Operations. Institutional procedures shall address possible exceptions and exigent circumstances, including any specific operational or physical plant issues. 3. Outside the housing unit, the facilities will maintain sight and sound separation between youthful incarcerated individuals and adult incarcerated individuals, or provide direct staff supervision when youthful incarcerated individuals and adult incarcerated individuals have sight, sound, or physical contact. 4. Facilities shall make best efforts to avoid placing youthful incarcerated individuals in isolation to comply with this provision. Absent exigent circumstances, facilities shall not deny youthful incarcerated individuals daily large-muscle exercise and any legally required special education services to comply with this provision.

Through such reviews, the facility met the standards requirements.

115.15 Limits to cross-gender viewing and searches

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Searches, Policy IO-SC-18, dated, January 2022
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Cross Gender Supervision, Policy/Procedure IO-SC-17, dated, June 2021
- 4. State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 6, Health Services, Policy HSP-704, dated, February 2022
- 5. Iowa ICIW Employee Search Training Logs, dated throughout 2021
- 6. Searches Guided Discussion Contraband and Searches Curricula, not dated

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors
- 4. Intake Sergeant
- 5. PREA Compliance Manager

Interviews with incarcerated individuals stated searches were conducted respectably, staff did not touch them during searches, they feel safe and were not left feeling violated by staff.

Interviews with staff demonstrated they had been trained on cross-gender searches, each had a list of gender dysphoria incarcerated individuals, and each search is documented in the facility electronic log in ICON.

Site Review Observation:

- 1. Intake area
- 2. Search area

During the tour of the facility the Auditor observed the Intake Department. Incarcerated individuals are brought in through the Sallyport. New intakes are brought into a small waiting area where court documents are verified, property is examined, medically cleared then restraints are removed. Next, one at a time intakes stand in the body scan machine, (males do not work in the intake department) and then complete a full body search behind a ½ or full door. Once dressed, intakes area given a white folder with facility information to include the facility PREA policy, reporting and advocate information. A female correctional officer and medical staff are in the intake area at all times when intakes are present. Once the incarcerated individual signs for her intake articles, she is moved to the medical department. The Intake Department had a standardized bulletin board with PREA-Creating Culture and third-party signage.

(a) The Iowa Correctional Institution for Women PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Inmates. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of Inmates.

State of lowa Department of Corrections Policy and Procedures, Chapter 3, Searches Policy IO-AD-SC-18, pages 5-6, section 2.a., states, "An unclothed body search is a visual body search also called a strip search. Unclothed body searches shall be conducted by staff of the same gender as the incarcerated individual being searched or gender as identified per HSP-704 unless search procedures are otherwise outlined in the treatment plan. A Correctional Officer shall not touch an incarcerated individual during an unclothed body search unless it's a forced search. Staff shall wear protective gloves while conducting unclothed body searches. Gloves shall be changed whenever there is contamination by visible blood. Staff of the opposite sex may perform an unclothed body search and visual body search, in exigent circumstances. Searches conducted under exigent circumstances require two (2) staff members. However, even at these times, searches of the opposite gender must be conducted with dignity and professionalism, and only if a correctional officer of the same gender is not available, there is a legitimate serious security concern that a weapon or dangerous contraband may be recovered by the search that could not otherwise be retrieved and the search has been approved by the Warden or Institution Duty Officer. Staff shall document the reasons for the opposite sex search by memorandum and forward to the Warden through the Associate Warden of Security.

The Warden/On-Call Administrator or designee shall be the approving authority for unclothed searches on a female incarcerated individual by male staff. Another staff member shall be present in these situations."

Page 7, section b., states, "Visual inspections of incarcerated individual body cavities may be authorized by Warden on a reasonable belief that the incarcerated individual is carrying contraband or other prohibited material on or in the body. Such

an inspection shall be conducted in privacy by a designated, qualified health practitioner. (LPN, RN, PA, Physician)"

Page 10, section D.1., states, "Body Scan searches shall be conducted in a respectful and dignified manner by trained staff of the same gender as the incarcerated individual being searched or the gender as identified per HSP-704. In an emergency, (e.g., escape, riot, etc.), this gender provision may be waived. However, even at these times, searches of the opposite gender must be conducted with dignity and professionalism, and only if a correctional officer of the same gender is not available and there is a legitimate serious security concern that a weapon or dangerous contraband may be recovered by the search that could not otherwise be retrieved."

- (b) Iowa Correctional Institution for Women PAQ states the facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. This facility does not house female inmates.
- (c) lowa Correctional Institution for Women PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified. The facility does not house female inmates.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Searches Policy IO-AD-SC-18, page 5, section 1. B., states, "Pat searches of female incarcerated individuals as well as those patients identified as female per HSP-704 may be conducted only by female employees unless otherwise identified in the treatment plan or there is substantial reason for an immediate search and no qualified female employee is available. All emergent cross gender pat searches of female incarcerated individuals shall be documented by memo to the Associate Warden of Security and the Warden or otherwise documented in accordance with a specific institutional procedure. Pat searches of female incarcerated individuals as well as those patients identified as female per HSP-704 may be performed in any area of the institution and during movement on a routine or random basis."

Page 7, section D. 3., states, "Each occurrence shall be fully documented with a copy of the authorization from the Warden kept in the incarcerated individual's file."

Page 10, section D. 2, states, "Staff of the opposite sex may perform a body scan search, in exigent circumstances, and shall document the reasons for the opposite sex search by memorandum and forward to the Warden through the Associate Warden/Security."

(d) lowa Correctional Institution for Women PAQ states the facility has implemented policies and procedures that enable Inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera).

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Cross Gender Supervision Policy IO-AD-SC-17, page 2, section B. 3., states, "Staff shall exercise discretion when incarcerated individuals are using the toilet facilities. The facility shall implement procedures that enable incarcerated individuals to shower, perform bodily functions and change clothing without nonmedical staff of the opposite gender viewing their breasts (female incarcerated individual as well as those patients identified as female per HSP-704, Management of Gender Dysphoria), buttocks, or genitalia, except in exigent circumstance or when viewing is incidental to routine cell checks."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Cross Gender Supervision, Policy IO-SC-17, page 3, section 4.a-c., states, "Incarcerated individuals shall be made aware of the fact that staff of the opposite gender will be present on the housing unit.

- a. Each housing unit shall be required to prominently post notices of this fact in multiple locations throughout the housing unit including the bulletin boards normally used for posting notices to incarcerated individuals. The notice shall also inform incarcerated individuals of the use of a distinct buzzer, bell, or other noisemaking device that indicates a person of the opposite gender is newly entering the living unit.
- b. All persons of the opposite gender entering a housing unit between the hours of 6:00 am and 10:00 pm shall press a distinct buzzer, bell, or other noisemaking device that indicates the person is newly entering the unit. The device shall not be used for any other purpose.
- c. In addition, Notice may also be provided by other means such as an in-house television station where notices to incarcerated individuals are provided."
- (e) The Iowa Correctional Institution for Women PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex Inmate for the sole purpose of determining the inmate's genital status. Such searches did not occur in the past 12 months.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Cross Gender Supervision Policy IO-AD-SC-17, page 4, section E. 4., states, "Institutional security staff shall not search or physically examine a transgender or intersex incarcerated individual for the sole purpose of determining the incarcerated individual's genital status. If the incarcerated individual's genital status is unknown, it may be determined during conversations with the incarcerated individual, 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."

State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 6, Health Services, Policy HSP-704, page 6, section B. 3., states, "Identify the patient's preference for the gender of staff who shall conduct strip searches. This information shall then be forwarded to the security. Searches or physical examinations of transgender or intersex patients by any staff member other than a physician for the purpose of determining a patient's genital status are prohibited. (PREA 115.15(e)) A list is on the ICIW Home Page under the security tab. The psychologist is responsible for keeping the list updated when new patients are diagnosed."

(f) The Iowa Correctional Institution for Women PAQ states 100% of security staff receive training on conducting crossgender pat-down searches and searches of transgender and intersex Inmates in a professional and respectful manner.

The facility provided a Searches Guided Discussion Contraband and Searches Curricula. The curricula include the following components:

- Step 1: Introduce eLearning, Contraband and Searches
- Step 2: Bring up the eLearning and utilize it as a guide.
- o Highlight transgender searches (both pat down and strip); refer to institution procedures and policy HSP-704.
- · Classroom discussion
- o E-learning questions
- o Provide examples
- o Why do we conduct searches?
- o Identify the different types of searches
- o Why is it important to be professional when doing searches?
- Activates
- o Apply what you have learned
- Wrap Up
- Tip/Tricks
- o ALWAYS wear gloves
- o Look before you touch
- o Think out of the box for areas that can conceal contraband
- o Remember Situational Awareness
- o DO NOT GET COMPLACENT

The facility provided Iowa ICIW Employee Search Training Logs. The log demonstrates employees have completed training for Contraband Control and Searches or Contraband and Searches Hybrid trainings.

Through such reviews, the facility met the standards requirements.

115.16 Inmates with disabilities and inmates who are limited English proficient

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Incarcerated Individual Intake and Orientation, Policy IS-RO-02, dated, May 2021
- 3. Spanish Staying Safe A Guide for Incarcerated Individual Conduct, not dated
- 4. Language Link Account Instruction page, not dated
- 5. Post Audit: Iowa Correctional Institution for Women Email Communication, Subject: PREA Orientation in Pohnpeian Competed, dated 7.16.2022

Interviews:

- 1. Targeted incarcerated individuals
- 2. Correctional Counselor

Interviews with incarcerated individuals who were disabled either cognitively or physically had a clear understanding of PREA protocols, available reporting options and advocacy services.

Interviews with an interpreter for two non-English speaking incarcerated individuals demonstrated they could not articulate their understanding of the agency zero tolerance policy and reporting protocols.

Post Audit the facility provided a Post Audit: Iowa Correctional Institution for Women Email Communication, Subject: PREA Orientation in Pohnpeian Competed addressed to the PREA Compliance Manager, from a Correctional Counselor, stating, "The interpreter hung up before I could look down at my phone to see how long we had been on. I know that the last time I looked at my phone to check it had been an hour and 55 minutes and we were on for, I am guessing, about 5 more minutes. So, I am going to put 2 hours on the Expenditure. Hopefully, that is close. It took a little longer than the other ones as she had questions throughout, and he would need to explain it to her again. Anne - During the session she asked about utilizing our services here (mental health services) if she had been a victim of sexual abuse outside of here. I had the interpreter let her know that I can absolutely refer her to mental health staff here to start working on this. I will send a follow up email to you and the Psychologist for her unit. I just want to let you all know that she was very appreciative of this and understanding it."

The Correctional Counselor stated she completed comprehensive training within 30 days of intake with each incarcerated individual, who then acknowledge their participation on the sign off sheet once the agency policy and SANE Safe Guide have been reviewed.

(a) The Iowa Correctional Institution for Women PAQ states the agency has established procedures to provide disabled Inmates equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Incarcerated Individual Intake and Orientation, Policy IS-RO-02, page 7, section 6., states, "IDOC shall not rely on incarcerated individual interpreters, incarcerated individual readers, or other types of incarcerated individual assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the incarcerated individual's safety, the performance of first-response duties or the investigation of the incarcerated individual's allegations."

Pages 6-7, section D. 1-6, state,

- 1. "IDOC shall take appropriate steps to ensure that incarcerated individuals with disabilities (including, for example, incarcerated individuals who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of IDOC's efforts to prevent, detect, and respond to sexual assault, sexual abuse, and sexual harassment.
- 2. Such steps shall include, when necessary to ensure effective communication with incarcerated individuals who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively using any necessary specialized vocabulary. 3. In addition, IDOC shall ensure that written materials are provided in formats or through methods that ensure effective communication with incarcerated individuals with disabilities, including incarcerated individuals who have intellectual disabilities, limited reading skills, or who are blind or have low vision.
- 4. IDOC is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164.
- 5. IDOC shall take reasonable steps to ensure meaningful access to all aspects of the department's efforts to prevent, detect, and respond to sexual assault, sexual abuse, and sexual harassment to incarcerated individuals who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both

receptively and expressively, using any necessary specialized vocabulary.

- 6. IDOC shall not rely on incarcerated individual interpreters, incarcerated individual readers, or other types of incarcerated individual assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the incarcerated individual's safety, the performance of first-response duties or the investigation of the incarcerated individual's allegations."
- (b) The Iowa Correctional Institution for Women PAQ states the agency has established procedures to provide inmates with limited English 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. Policy compliance can be found in provision (a) of this standard.

The facility provided a Spanish Staying Safe – A Guide for Incarcerated Individual Conduct training for inmates. The Guide includes the following topics:

- o Some Ways to Keep Yourself Safe
- o Unwanted Sexual Misconduct is:
- o Incarcerated Individual Rights in the Event of Unwanted Sexual Misconduct by Others
- o Other Ways to Report Sexual Misconduct or Assault
- o Possible Outcomes of an Investigation for the Incarcerated Individual
- o Recovering from Sexual Assault

The Guide for Incarcerated Individual Conduct includes the inmate's printed and signed name and date of training. The Guide is also signed and dated by staff.

The facility provided a Language Link Account instruction page. The instruction page includes steps for calling, entering an account number, and selection numbers for different language options.

(c) The Iowa Correctional Institution for Women PAQ states the agency prohibits the use of inmate interpreters. In the last 12 months the facility has had zero instances where inmates were used for interpreters. Policy compliance can be found in provision (a) of this standard.

Through such reviews, the facility meets the standard requirements

115.17 Hiring and promotion decisions

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, dated, June 2020
- 3. Agreement Between the Iowa Department of Corrections and AFSCME as Provided by the Chapter 20, Code of Iowa (2017)
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Agreements and Contracts, Policy AD-GA-13, dated, April 2016
- 5. Authorization for Release of Information and Applicant's Background Information, dated May 2017
- 6. Staff Background Spreadsheet
- 7. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Iowa Department of Corrections Rules of Employee Conduct, Policy AD-PR-11, dated, November 2020
- 8. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Staff Response to Incarcerated Individual-On-Individual Incarcerated Individual Sexual Violence or Retaliation (PREA), Policy PREA-03, dated, August 2021
- 9. Email Notification Iowa.Gov Background checks for staff, dated 3.4.2022
- 10. Final Applicant Pre-Hire Checklist, not dated

Interviews:

- 1. Training Specialist
- 2. Human Resource Associate

Interviews with the Human Resource staff demonstrated administrative adjudication questions are asked during the interview process, background checks are completed every two years, affirmative action is required, and institutional reference checks are completed for applicable applicants and or answered for employers requiring institutional reference checks.

Site Review Observation:

Review of 16 staff personnel files demonstrated institutional references were completed for all applicable staff, where applicable (staff hired after PREA implementation) each had been asked adjudication questions during the interview process and at promotion and criminal history checks had been completed at hire or December of 2020 for staff being employed longer than one year.

(a) The Iowa Correctional Institution for Women PAQ states the agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who has engaged in or been convicted in or administratively adjudicated in sexual activity described in paragraph (a)(2) of this standard.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, page 4, section c., states, "Has been civilly or administratively adjudicated to have engaged 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"

Agreement Between the Iowa Department of Corrections and AFSCME as Provided by the Chapter 20, Code of Iowa (2017), and IDOC Policy AD-PR-05 page 2-3, section 3.4 A., states "The Agency shall not hire anyone who may have contact with offenders who has: 1. Engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; 2. Been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or 3. Been civilly or administratively adjudicated 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."

The facility provided an Authorization for Release of Information and Applicant's Background Information. Page 4, section 1-2, ask applicants the following questions.

- 6. "Have you ever been convicted, civilly adjudicated or administratively adjudicated of engaging or attempting to engage in sexual harassment, or 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?
- 7. Have you ever resigned during a pending investigation or an allegation of sexual violence or sexual harassment while employed at a prison, jail, lockup, community confinement facility, juvenile facility or other institution?"
- (b) The Iowa Correctional Institution for Women PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have

contact with inmates.

State of lowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, page 4, section 2, states, "The institution shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, who may have contact with incarcerated individuals."

(c) The Iowa Correctional Institution for Women PAQ states Agency policy requires background checks are conducted with all new hires who have contact with inmates and makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months 42 persons hired may have contact with an inmate who have had criminal background checks.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, page 4, section 3, states, "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."

(d) The Iowa Correctional Institution for Women PAQ states the agency policy requires that a criminal background records check be completed before enlisting the services of any contractor who may have contact with inmates. In the past 12 months there were four contracts for services where criminal background record checks were conducted on all contractors covered in the contract who might have contact with inmates.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Agreements and Contracts, Policy AD-GA-13, page 4, section 3, states, "IDOC shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with offenders."

Agreement Between the Iowa Department of Corrections and the ____ As Provided by the Chapter 28E, Code of Iowa (2017), page 3, section 3.4 C., states, "The Agency shall perform a criminal background records check before hiring any person who may have contact with offenders. Background checks on all current employees who have contact with offenders shall be conducted every five years or the Agency shall have in place a system for otherwise capturing such information."

(e) The Iowa Correctional Institution for Women PAQ states the agency requires background checks to be completed every five years. Policy compliance can be found in provision (d) of this standard.

The facility provided an Email Notification – Iowa.Gov – Background checks for staff. The email is from the Agency Contract Administrator and states, "PREA Backgrounds were done in December 2020. All staff hired in 2021 had background check completed upon hire. We will be undertaking the task of backgrounds for all staff again in April."

- (f) State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, page 4, section 4, states, "The institution shall ask all applicants and employees who may have contact with incarcerated individuals directly about previous misconduct described in paragraph (1) above of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The institution shall also impose upon employees a continuing affirmative duty to disclose any such misconduct."
- (g) The Iowa Correctional Institution for Women PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Employee Selection, Policy AD-PR-05, page 4, section 5, states, "Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination."

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Iowa Department of Corrections Rules of Employee Conduct, Policy AD-PR-11, page 4, section 7 states, "Report any conviction for sexual assault or sexual abuse of an incarcerated individual/client in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or if they 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, or if the victim did not consent or was unable to consent or refuse; or if they have been civilly or administratively adjudicated to have engaged in any such conduct. Material omissions or the provision of materially false information regarding sexual assault or sexual abuse of an incarcerated individual/client as described above shall be grounds for termination."

- (h) The facility provided a Final Applicant Pre-Hire Checklist. This checklist documents:
- PREVIOUS INSTITUTION EMPLOYERS: Reference Check with the following Questions being asked sent: Did the applicant have any substantiated allegations or resign during a pending investigation of an allegation of sexual violence or sexual harassment? PREA STANDARD 115.17(c)(2)(d)
- Date completed
- Response received

- Date received back
- Initials of person completing

Through such reviews, the facility meets the standard requirements

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Iowa Correctional Institution for Women PAQ
	Interviews:
	1. PREA Compliance Manager
	Interviews with the PREA Manager demonstrated cameras and staff supervision is used throughout the campus.
	Site Review Observation:
	Multiple cameras were witnessed throughout the facility. Cameras were reviewed and each were found to be operable.
	(a) The Iowa Correctional Institution for Women PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.
	(b) The Iowa Correctional Institution for Women PAQ states the facility installed new software and video servers to expand retention of recorded video to 60 days, in the last 12 months.
	Through such reviews, the facility meets the standard requirements

115.21 Evidence protocol and forensic medical examinations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-03, dated, August 2021
- 4. State of Iowa Department of Corrections, Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-SC-22, dated, January 2022
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy IS-CL-02, dated, August 2021
- 6. State of Iowa Department of Corrections Policy and Procedures, Iowa Correctional Institution for Women, Chapter 6, Health Services, Policy HSP-628, dated, June 2021
- 7. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-01, dated, August 2021
- 8. Certificate of Completion, PREA Qualified Staff Training, dated May 13, 2014
- 9. Iowa Organization for Victim Assistance Attestation, dated May 12, 2021
- 10. Memorandum of Understanding Prison Rape Elimination Act Responsibilities between Iowa State Penitentiary (ISP) and the Rape Victim Advocacy Program (RVAP), dated 2.9.2022
- 11. Iowa State Penitentiary Interoffice Memorandum, Subject: PREA Qualified Staff, dated 12.20.2021

Interviews:

- 1. Correctional Counselors
- 2. RN

Formal and informal interviews with incarcerated individuals and staff indicated they were aware victim services available to residents at this facility. Incarcerated individuals and staff interviewed stated PREA postings in the living areas and throughout the facility had call information to hotlines and victim services.

The RN stated she would collect evidence by having the incarcerated individual undress on a large piece of paper. Once evidence is collected, services would be offered to the victim, immediately.

Site Review Observation:

There were zero investigations in the past 12 months requiring a forensic exam.

(a) The Iowa Correctional Institution for Women PAQ states the facility is responsible for conducting Administrative Investigations and the Central Office, Department of Criminal Investigation is responsible for conducting criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-03, page 1, section Purpose, states, "To describe the procedures that shall be used at all Iowa Department of Corrections (IDOC) institutions to ensure that prevention, detection, response, investigation, prosecution, and tracking of incarcerated individual-on-incarcerated individual sexual violence and retaliation allegations are completed by professional criteria and principles and meet the requirements of the PREA standards."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-02, page 17, section d., states "Follow institution procedures for the bags of clothing to be placed in the institution's evidence storage."

State of Iowa Department of Corrections Policy and Procedures, Iowa Correctional Institution for Women, Chapter 3, Institutional Operations, Policy IO-SC-22, page 4, section 10. a., states, "Follow the established uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol shall be developmentally appropriate for youth where applicable, and as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication "A National Protocol for Sexual Abuse Medical Forensic Examinations. Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011."

- (b) The Iowa Correctional Institution for Women PAQ states the protocol being developmentally is appropriate for youth. Policy compliance can be found in provision (a) of this standard.
- (c) The Iowa Correctional Institution for Women PAQ states the facility offers all inmates who experience sexual abuse

access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There have been zero medical exams, SAFE/SANE exams performed in the last 12 months. Forensic exams are completed at the Mercy Medical Center, also known as Mercy One.

State of Iowa Department of Corrections Policy and Procedures, Iowa Correctional Institution for Women, Chapter 6, Health Services, Policy HSP-628, page 4, section 5., states, "IDOC shall offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) wherever possible If SANEs or SAFEs cannot be made available, the examination can be performed by other qualified medical protections. Efforts to provide SAFEs or SANEs is documented in each intuition's Memorandum of Understand (MOU). ICIW medical staff do not perform sexual assault exams. Incarcerated individuals are referred to Mercy Hospital in Des Moines for these services."

On 4.24.2022 at 1:35 pm, this Auditor phoned Mercy Medical Center at 1111 6th Avenue, Des Moines, IA 50314 at phone number 515.247.3121. Upon proper introductions and stating the reason for the call, the Auditor was transferred to the Emergency Room. Upon proper introductions and stating the reason for the call, the Auditor was transferred to Emergency Room ED Nurse who stated SANE nurses and a patient advocate is on call to perform exams. The ED Nurse stated the facility is aware of the institution bringing in inmates, and those inmates are brought in frequently, unfortunately.

(d) The Iowa Correctional Institution for Women PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services, the facility utilized two Correctional Counselors and or a Sergeant.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-01, page 8, section 3., states, "An incarcerated individual victim may request a victim advocate or qualified IDOC staff member to accompany and support the incarcerated individual victim through the investigatory interviews and to provide emotional support, crisis intervention, information, and referrals to additional resources. The victim advocate or qualified IDOC staff member shall meet with the victim in a private area and may continue for up to six sessions."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-02, page 15, section 6., states, "The incarcerated individual victim is offered the opportunity to meet with a victim advocate from a community crime victim center. If an advocate from the community is not available to provide victim advocate services, the shift supervisor shall ensure that the opportunity to meet with a qualified staff member is offered to the victim. The effort to secure services from the community shall be documented. If the incarcerated individual victim desires to meet with a victim advocate or qualified staff member, the shift supervisor shall immediately make the arrangements. If the incarcerated individual victim is transported to an outside healthcare facility, this opportunity shall be offered immediately upon return to the institution and arrangements made if the incarcerated individual victim so desires."

State of Iowa Department of Corrections Policy and Procedures, Iowa Correctional Institution for Women, Chapter 6, Health Services, Policy HSP-628, page 5, section h., states, "The Shift Supervisor shall attempt to make available to the patient a victim advocate from a community crime victim center. If a community crime victim center is not available to provide victim advocate services, the Shift Supervisor shall make these services available through a qualified staff member from a community-based organization, or a qualified IDOC staff member. The Shift Supervisor shall document such efforts. The RN will ensure that an advocate has been offered to the incarcerated individual and will notify the Shift Supervisor so they can make arrangements as it applies. Polk County Crisis and Advocacy services are the off-site agency ICIW uses. The RN will document in medical ICON."

The facility provided a Certificate of Completion, PREA Qualified Staff Training. This eight-hour training was completed by the Sergeant noted in the PAQ.

The facility provided an Iowa Organization for Victim Assistance Attestation. This certificate attest that the Sergeant noted on the PAQ successfully completed the requirements for victim service providers.

(e) The Iowa Correctional Institution for Women PAQ states a qualified community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-02, page 15, section 7., states, "If requested by the victim, the victim advocate or qualified staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. All counseling sessions shall be held in a private area. Counseling may continue for up to six sessions."

(f-h) The Iowa Correctional Institution for Women PAQ states the agency is not responsible for administrative investigations. See provision (d) for the facilities qualified community-based staff member.

Through such reviews, the facility meets the standard requirements.

115.22 Policies to ensure referrals of allegations for investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administrative & Management, Policy AD-PE-13, dated, August 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-02, dated, September 2021
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Major Discipline Report Procedures, Policy IO-RD-03, dated, May 2021
- 5. ICIW Correctional Officer Allegation
- 6. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-04, dated, August 2021
- 7. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, dated, August 2021

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors
- 4. Targeted staff

Incarcerated individuals and staff interviews demonstrated each can report incidents of sexual abuse and sexual harassment by reporting Correctional Counselors, Duty Officer, use the kiosk, write allegations on paper and handing to staff, calling the Ombudsman or the PREA hotline.

Site Review Observation:

There were 31 investigations reported in the last 12 months, demonstrating the facility provides a culture for reporting and responding to sexual harassment and sexual abuse investigations.

(a) The Iowa Correctional Institution for Women PAQ states the agency ensures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had 31 allegations of sexual abuse and sexual harassment that were received. In the past 12 months 31 allegations resulted in an Administrative Investigation. In the past 12 months one investigations resulted in a Criminal Investigation.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administrative & Management, Policy AD-PR-13, page 2, section A. 2., states, "Incidents of staff sexual misconduct, sexual harassment, retaliation, or staff neglect or violation of responsibilities that may have contributed to such incidents shall be investigated by an Institutional Operations Investigator. For PREA related incidents refer to IDOC policy PREA-02, Staff, Contractor, or Volunteer Sexual Misconduct/Harassment/ Retaliation with Incarcerated Individuals."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-02, page 2, section 8, states, "The Deputy Director of Institution Operations/Designee shall ensure that an administrative or criminal investigation is completed for all allegations of sexual violence, sexual misconduct, sexual harassment, or retaliation."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Major Discipline Report Procedures, Policy IO-RD-03, page 6, section 6, states, "The Deputy Director of Institution Operations/Designee shall ensure that an administrative or criminal investigation is completed for all allegations of precursor behavior, sexual abuse, sexual harassment, or retaliation."

The facility provided a ICIW Correctional Officer Allegation. This allegation has a completed unsubstantiated investigation involving a staff member.

(b-c) The Iowa Correctional Institution for Women PAQ states the agency has policy that requires allegations of sexual abuse or harassment to be referred for investigation to an agency with the legal authority to conduct criminal investigations. Referrals are documented in the Sexual Violence Investigation Database.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Major Discipline Report Procedures, Policy IO-RD-03, page 37, section 5., states, "In cases involving allegations of sexual violence, the Inspector General/Designee rather than the Warden/Designee shall handle issues connected with possible criminal prosecution. The Inspector General/Designee may consult with the police and prosecuting authorities and the incarcerated individual will receive a

Miranda warning when appropriate."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-04, page 2, section 3., states, "IDOC shall publish the sexual violence investigation policies on its website."

The agency's policy regarding sexual harassment for criminal investigation is published at Search | Iowa.gov

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-02, page 8, section 8, states, "The Deputy Director of Institution Operations/Designee shall ensure that an administrative or criminal investigation is completed for all allegations of sexual violence, sexual misconduct, sexual harassment, or retaliation."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, page 6, section 6, states, "The Deputy Director of Institution Operations/Designee shall ensure that an administrative or criminal investigation is completed for all allegations of precursor behavior, sexual abuse, sexual harassment, or retaliation."

115.31 Employee training

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-TS-04, dated, November 2020
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-TS-05, dated, March 2021
- 5. FY22 PREA Report PREA Training
- 6. Searches Guided Discussion Curriculum, not dated
- 7. National Institute of Corrections, Safety Matters, Relationships in Women's Facilities, Participant Manual, not dated
- 8. PREA PowerPoint Online Learning Management System Training, not dated
- 9. Post Audit: State of Iowa Staff Education Documentation, 2021
- 10. Post Audit: Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, dated 6.20.2022

Interviews:

- 1. Facility staff
- 2. Training Specialist

Interviews with staff demonstrated each were aware of and received initial and annual PREA training. When prompted, staff could speak to being trained on the agency zero tolerance policy, searches, immediately reporting of any type of information they may receive, and first responder duties.

Site Review Observation:

Employee file review demonstrated employees have not completed PREA education, each year. The facility was asked to complete the following action plans:

- PREA education will be completed, each year, on sexual abuse and sexual harassment policies and procedures.
- In years in which employees do not receive refresher training, how the facility will provide refresher information on current sexual abuse and sexual harassment policies

Post Audit:

The facility provided State of Iowa Staff Education Documentation in the following subjects for employee files reviewed during the on-site review.

- Incarcerated individual PREA Information
- · Contractor or Volunteer Sexual Misconduct Harassment Retaliation with Incarcerated Individuals
- Staff Response to Incarcerated Individuals-On-Individual Sexual Violence or Retaliation
- PRA Data Collection, Reporting, and Audit Compliance

The facility provided a Post Audit: Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, from the Warden, addressed to the Training Specialist and the Deputy Warden. The memorandum states, "ICIW will provide yearly annual training to staff for PREA. The e-learning is the annual training, so specifying it will be assigned the first quarter of every fiscal year.

(a) The Iowa Correctional Institution for Women PAQ states the agency trains all employees who may have contact with Inmates in all required provisions of this standard.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-TS-04, page 9, section I., states, "Such training shall be tailored to the gender of the incarcerated individuals/clients at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male incarcerated individuals/clients to a facility that houses only female incarcerated individuals/clients, or vice versa."

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-TS-05, page 7, sections e. – I., state,

- e. "The dynamics of sexual violence and sexual harassment in confinement;
- f. The common reactions of sexual violence and sexual harassment victims;
- g. How to detect and respond to signs of threatened and actual sexual violence;
- $h. \ \ How to avoid in appropriate relationships with incarcerated individuals;$
- i. How to communicate effectively and professionally with incarcerated individuals, including lesbian, gay, bisexual, transgender nonconforming incarcerated individuals;

- j. Such training shall be tailored to the gender of the incarcerated individuals at the employee's facility. The employee shall receive additional training if the employee is reassigned from an institution that houses only male incarcerated individuals to an institution that houses only female incarcerated individuals, or vice versa;
- k. IDOC shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual violence and sexual harassment policies and procedures. In years that employees don't receive refresher training, IDOC shall provide refresher information on current sexual violence and sexual harassment policies;
- I. IDOC shall document, through employee signature or electronic verification, that employees understand the training they have received."

The facility provided a FY22 PREA Report – PREA Training. This report demonstrates 103 of 140 employees have completed PREA training for the 2022 fiscal year. The report includes staff names, subscription dates, first access date, course completion date, progress, total time, user status and score.

The facility provided a Searches Guided Discussion Curriculum. This curriculum includes the following topics:

- Introduces Contraband and Searches: "The course will give you the opportunity to better understand contraband and searches. It will also give you the opportunity to do some hands-on-training."
- Key Points: "Highlight transgender searches (both pat down and strip); refer to institution procedures and policy HSP-704."
- Discussion: Questions; why we do searches, why this is important.

The facility provided a PREA PowerPoint Online Learning Management System Training. This PowerPoint includes the following topics:

- PREA Inmate Sexual Abuse
- Important Functions of PREA
- Annual Report to DOJ/BJS
- · Iowa Department of Corrections Policy
- PREA is Everyone's Responsibility
- Zero Tolerance
- Definitions
- Incarcerated Individuals' Rights
- · Red Flags
- · Our Responsibilities
- Reporting
- Detection
- Response
- Professional Boundaries
- Communication
- Respect: LGBTQI
- PREA Standard 115.53 requires individual access to outside confidential support services
- Recognize our responsibilities in regard to PREA.
- Restate the definitions and Dynamics of Sexual Violence.
- Describe the Common Victim Reactions to Sexual Violence.
- Demonstrate effective communication skills with all incarcerated individuals.
- (b) The Iowa Correctional Institution for Women PAQ states training is tailored to the unique needs and attributes and gender of inmates at the facility. Policy compliance can be found in provision (a) of this standard. "Along with the agency training on PREA, ICIW providers all staff with the NIC training: Safety Matters. This is a gender responsive trauma informed program designed to help staff navigate the issues involving physical, sexual, relational, and emotional safety for female incarcerated individuals."

The facility provided a National Institute of Corrections, Safety Matters, Relationships in Women's Facilities, Participant Manual. This training focuses on:

- 1. Building upon foundational training in gender-responsive practice, motivational interviewing skills, and Prison Rape Elimination Act (PREA) knowledge.
- 2. Examining the intent and practical implementation of PREA standards specific to women's relationships while incarcerated
- 3. Exploring the key dynamics of women's behavior and relationships while incarcerated
- 4. Embracing the importance of institutional culture
- 5. Practicing skills to intervene effectively and mitigate inappropriate inmate sexual relationships.
- (c) The Iowa Correctional Institution for Women PAQ states between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment. The frequency with which employees who may have contact with inmates receive refresher training on PREA requirements, yearly. Policy compliance can be found in provision (a) of this standard.
- (d) The Iowa Correctional Institution for Women PAQ states the agency documents that employees who may have contact

with inmates, understand the training they have received through employee signature or electronic verification. Policy compliance can be found in provision (a) of this standard.

115.32 Volunteer and contractor training Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. Acknowledgement of Receipt Department of Corrections Staff, Contractor, or Volunteer Sexual Misconduct/Harassment/Retaliation with Offenders, dated 12.2014
- 3. Sexual Misconduct with Offenders Brochure, not dated

Interviews:

- 1. Educator Coordinator for DIMAC
- 2. PREA Compliance Manager

An education contractor reported completing extensive PREA education through e-learning, every year. The Education Coordinator stated she knew how to recognize a potential target, is hyper vigilant of cognitive situations, recognize when someone is a potential culprit and staff and administration have an awareness of keeping incarcerated individuals and themselves safe, at all times.

- (a) The Iowa Correctional Institution for Women PAQ states all volunteers and contractors who have contact with Inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. 43 contractors and volunteers, who have contact with Inmates, have completed the required training.
- (b) The Iowa Correctional Institution for Women PAQ states all volunteers and contractors who have contact with Inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Policy compliance can be found in provision (a) of this standard.

The facility provided a Sexual Misconduct with Offenders Brochure. This brochure informs contractors and volunteers of the following:

- · An Issue of Power
- o Sexual Misconduct
- o Sexual Harassment
- An Issue of Law
- Retaliation
- · Safety and Security are the First Priorities
- A Special Note to Persons in Positions of Power

The facility provided an Acknowledgement of Receipt Department of Corrections Staff, Contractor, or Volunteer Sexual Misconduct/Harassment/Retaliation with Offenders. The acknowledgment states, "I acknowledge that I have received the Department of Corrections Staff, Contractor, or Volunteer Sexual Misconduct/Harassment/Retaliation with Offenders Policy PREA-02. I further acknowledge that I have been directed to read this document and that I was offered an opportunity to ask questions about the content. I understand that I am subject to and shall be expected to comply with the IDOC Policy." Each contractor prints and signs his/her name and dates the document. A witness signature and date is also required.

(c) The Iowa Correctional Institution for Women PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.

Post Audit: The facility provided State of Iowa Staff Education Documentation in the following subjects for employee and contract files reviewed during the on-site review.

- Incarcerated individual PREA Information
- Contractor or Volunteer Sexual Misconduct Harassment Retaliation with Incarcerated Individuals
- Staff Response to Incarcerated Individuals-On-Individual Sexual Violence or Retaliation
- PRA Data Collection, Reporting, and Audit Compliance

115.33 Inmate education

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, dated, February 2021
- 3. PREA No Means No Posting, not dated
- 4. Zero Tolerance- Break the Silence Posting, not dated
- 5. You Have the Right to be free from Sexual Violence and Harassment Posting, not dated
- 6. Support Services of Offenders with Disabilities Posting, not dated
- 7. Iowa Correctional Institution for Women Handbook, dated June 2021
- 8. Post Audit: ICIW Revised Intake Checklist, not dated
- 9. Post Audit: Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, dated 6.20.2022
- 10. Post Audit: Iowa Correctional Institution for Women Email Communication, Subject: PREA Orientation in Pohnpeian Competed, dated 7.16.2022

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Intake staff
- 4. PREA Compliance Manager

Interviews incarcerated individuals demonstrated their understanding of reporting knowledge of PREA, reporting options to staff, writing a grievance, telling a friend, notifying a family member, calling the hotline numbers posted on Zero-tolerance Posters throughout the facility.

Site Review Observation:

- Incarcerated individual file review demonstrated, during the intake process, incarcerated individual PREA education was not documented.
- Targeted interviews with incarcerated individuals demonstrated training of agency PREA policies and procedures were not provided in a language understood by two non-English speaking residents. Neither resident was able to answer questions related to reporting options, risk assessments, hotline and or advocate contact information.

The facility was requested to:

- The facility to update the intake checklist to include PREA education provided during the intake process. Training documentation to be uploaded in the incarcerated individual file. Revised checklist to be uploaded to the online audit system.
- The facility to provide training, in the language of non-English speaking residents and upload incarcerated individual participation in training sessions into the supplemental files on the online audit system.
- Facility Warden to provide a sustainable action plan, addressed to applicable staff and the PREA Auditor, regarding PREA intake and non-English education provided for Incarcerated Individuals.

Post Audit the facility provided a ICIW Revised Intake Checklist. This revised checklist demonstrates newly admitted Incarcerated Individuals would be acknowledging receipt of an orientation packet, copy of the PREA policy and a copy of the Staying Safe Form.

Post Audit the facility provided an Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, addressed to Unit Managers, ICIW Captains and ICIW Sergeants, stating,

- Intake officers shall notify the Intake Counselors that new admits that have a limited English proficiency.
- After notification the counselor will document that the PREA education was provided utilizing the DOC language services.

Post Audit the facility provided a Post Audit: Iowa Correctional Institution for Women Email Communication, Subject: PREA Orientation in Pohnpeian Competed addressed to the PREA Compliance Manager, from a Correctional Counselor, stating, "The interpreter hung up before I could look down at my phone to see how long we had been on. I know that the last time I looked at my phone to check it had been an hour and 55 minutes and we were on for, I am guessing, about 5 more minutes. So, I am going to put 2 hours on the Expenditure. Hopefully, that is close. It took a little longer than the other ones as she had questions throughout, and he would need to explain it to her again. Anne - During the session she asked about utilizing our services here (mental health services) if she had been a victim of sexual abuse outside of here. I had the interpreter let her know that I can absolutely refer her to mental health staff here to start working on this. I will send a follow up email to you and the Psychologist for her unit. I just want to let you all know that she was very appreciative of this and understanding it."

(a) The Iowa Correctional Institution for Women PAQ states inmates receive information at time of intake about the zero-

tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. 1149 inmates admitted in the past 12 months were given information at intake.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 4, section A. 1, states, "All incarcerated individuals shall receive PREA orientation training within three days of admission to IDOC, including information on IDOC's zero-tolerance policy regarding unwanted sexual behavior and how to report incidents or suspicions of unwanted sexual behavior. All incarcerated individuals shall be given a copy of the handout, Staying Safe: A Guide for Incarcerated Individual Conduct. The training shall be presented by staff, a Peer Educator, or a volunteer from the community."

(b) The Iowa Correctional Institution for Women PAQ states within the past 12 months, 195 inmates received age appropriate PREA education within 30 days of intake.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 4, section A. 2, states, "Within 30 days of intake, IDOC shall provide comprehensive education to incarcerated individuals either in person or through video regarding their rights to be free from unwanted sexual behavior and to be free from retaliation for reporting such incidents and regarding IDOC policies and procedures for responding to such incidents."

(c) The Iowa Correctional Institution for Women PAQ states of those who were not educated during 30 days of intake, all inmates have been educated subsequently.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 4, section A. 3, states, "Upon transfer to a different institution, incarcerated individuals shall receive training within the first seven days concerning how the policies and procedures of the incarcerated individual's new institution differ from those of the previous institution. Replacement copies of the handout, Staying Safe: A Guide for Incarcerated Individual Conduct, shall be provided as needed."

(d) The Iowa Correctional Institution for Women PAQ states Inmate PREA education is available in accessible formats for all inmates including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 5, section A. 4, states, "IDOC shall provide incarcerated individual education in formats accessible to all incarcerated individuals, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to incarcerated individuals who have limited reading skills."

(e) The Iowa Correctional Institution for Women PAQ states the facility maintains documentation of inmate participation in PREA education sessions.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 5, section A. 5, states, "IDOC shall maintain documentation of incarcerated individual participation in these education sessions either by generic note or the signed copy of Form 1 scanned into ICON incarcerated individual attachments."

(f) The Iowa Correctional Institution for Women PAQ states the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmate handbooks, or other written formats.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-01, page 5, section A. 6, states, "In addition to providing such education, IDOC shall ensure that key information is continuously and readily available or visible to incarcerated individuals through posters, bulletin boards, or other written formats."

The facility provided a PREA No Means No Posting. The posting regards instruction on reporting sexual abuse, reporting immediately by telling a staff member, send a kiosk message to the Warden or Deputy Warden, includes address and phone number information to the Director of Victim Services and the external agency of the Office of Citizen's Aide.

The Facility provided a Zero Tolerance – Break the Silence Posting. The poster states, "Report suspected sexual violence. Contact the Warden's office: 515.725.5042 or email IDOC: www.doc.state.ia.us Together we can help.

On 4.25.2022 at 3:13 pm, this Auditor phoned 515.725.5042 and received the following message: "You have reached the lowa Correctional facility for women. For the office of the Warden, press 2."

The facility provided a You Have the Right to be free from Sexual Violence and Harassment Posting, posted over inmate phones. The posting includes duplicate information found on the PREA No Means no postings.

The facility provided a Support Services of Offenders with Disabilities posting. The posting has contact information for:

- · Deaf or Hard of Hearing
- · Blind or Low Vision
- Limited or Non-English Speaking
- Intellectual, Psychiatric or Speech Disabilities
- Victim Advocacy Resources

The facility provided an Iowa Correctional Institution for Women Handbook. Page 20-21, state: "The Iowa Department of Corrections has a ZERO TOLERANCE policy for sexual abuse and sexual harassment. Report sexual abuse, sexual harassment, and sexual misconduct! Some Ways to keep yourself safe:

- · Choose your friends wisely. Look for people who are involved in groups and activities that interest you.
- Avoid being isolated where staff can't see you, and do not go into "off limit" areas.
- Do not allow another resident to be your "protector." They will want something in return.
- Do not accept gifts, loans, or favors from others. Most come with strings attached.
- Do not borrow, loan, or trade property or canteen with others.
- Do not let someone pull you into sharing secrets.
- Carry yourself in a confident manner.
- Be direct, firm, and say "no" when asked to do something you know is wrong.
- Trust your instincts. If you sense a situation is dangerous, it probably is.

If you have been a victim of a sexual assault, report it immediately.

Ways to Report:

- Tell a staff member you trust.
- Write to Victim and Restorative Justice Director Iowa Department of Corrections East 12th Street Des Moines, IA 50319
- Write the Ombudsman Ola Babcock Miller Building 1112 East Grand Des Moines, IA 50319
- Have a family member complete a third-party report through the IDOC website.

In Case of a Sexual Assault: Do not wash, drink, change your clothing or use the restroom. You may be taken to the local hospital or the health care unit for examination and evidence collection. You have the right to speak with a victim advocate and be protected from further victimization. You would be encouraged to seek mental health counseling. There are consequences for the perpetrator of sexual violence, charges may be filed, and discipline would result. If you have any questions regarding staying safe, PREA or what sexual assault is, contact your Counselor."

115.34 Specialized training: Investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, dated, August 2021
- 3. Iowa Department of Corrections Professional Development PREA Investigator Lesson Plan, not dated
- 4. Certificates of Completion (7): IDOC Division of Investigative Services
- 5. Certificate of Completion NIC PREA: Investigating Sexual Abuse in a Confinement Setting: Advanced Investigation, dated 11.27.2019
- 6. Department of Corrections Sexual Violence Investigator Training Certificate, dated 12.9.2021

Interviews and on-site file review:

1. Facility Investigator

Interviews with the facility investigator and personnel file review demonstrated that the facility investigator interviewed and those completing investigations, had completed annual investigator training and annual training as is mandated by standard 115.31.

(a-b) The Iowa Correctional Institution for Women PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, page 21, section J. 1, states, "In addition to the general training provided to all employees, the Deputy Director of Institution Operations shall ensure that, to the extent IDOC conducts sexual violence investigations, its sexual violence investigators have received specialized training in conducting such investigations in confinement settings."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, page 21, section J. 2, states, "Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, the impact of the Peace Officers' Bill of Rights, sexual abuse evidence collection in confinement settings, characteristics and behavior indicators of sexual violence perpetrators and victims in correctional settings, credibility assessments, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral."

The facility provided an Iowa Department of Corrections Professional Development PREA Investigator Lesson Plan. The 144-page lesson plan includes the following performance objectives:

- Identify techniques for interviewing juveniles during investigations of sexual abuse in confinement settings.
- Describe the dynamics of sexual abuse and sexual harassment in confinement settings.
- Identify best practice and policy requirements on first response procedures.
- Identify best practice and policy requirements on evidence collection in confinement settings, per the requirements of 115. (3)34.
- Understand what a final investigative report should contain.
- Identify techniques for writing the final report to ensure accuracy and clarity.
- Explain criteria required for administrative action and prosecutorial referral, per requirements of PREA standard 115. (3)34.
- Identify techniques for writing the final report to ensure accuracy and clarity.
- Explain criteria required for administrative action and prosecutorial referral, per requirements of PREA standard 115. (3)34.
- · Apply your understanding to increase prosecutions of cases that are substantiated and criminal in nature.
- (c) The Iowa Correctional Institution for Women PAQ states the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The PAQ states employees and the agency has 11 employees who have completed investigator training.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act (PREA), Policy PREA-03, page 21, section J. 3, states, "The Deputy Director of Institution Operations shall maintain documentation that sexual violence investigators have completed the required specialized training in conducting such investigations."

The facility provided seven certificates of completion for investigator training completed through the National Institute of Corrections.

The facility provided a Certificate of Completion - PREA: Investigating Sexual Abuse in a Confinement Setting: Advanced

Investigation completed through the National Institution of Corrections.

The facility provided a Department of Corrections Sexual Violence Investigator Training Certificate. This training demonstrates a 24-hour Sexual Violence Investigator Training was completed by the facility investigator.

115.35 Specialized training: Medical and mental health care

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Iowa Correctional Institution for Women, Chapter 1, In-Service Training, Policy AD-TS-05, dated, June 2021
- 4. Computer Generated Specialized PREA Medical and Mental Health Care Standards Training

Interviews:

- 1. RN
- 2. Psychologist

Medical and mental health staff report receiving PREA annual training through the e-learning system. Staff reported training included reporting responsibilities, reactions to abuse and what happens after an allegation is reported.

Site Review Observation:

File review of medical and mental health staff training records demonstrated each had completed specialized medical and mental health training as well as initial and annual training.

(a) The Iowa Correctional Institution for Women PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The facility has (100%) 31 medical and mental health staff who work at the facility have received training required by agency policy.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 7, section D. 1. a-d, state, "Each institution shall ensure that all full- and part-time medical and mental health care staff who work regularly in its facilities have been trained in:

- a. How to detect and assess signs of sexual violence;
- b. How to preserve physical evidence of sexual violence;
- c. How to respond effectively and professionally to victims of sexual violence; and $% \left(1\right) =\left(1\right) \left(1$
- d. How and who to report allegations or suspicions of sexual violence."
- (b) The Iowa Correctional Institution for Women PAQ states their medical staff do not conduct forensic medical exams.
- (c) The Iowa Correctional Institution for Women PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 7, section D. 2., states, "The institution shall maintain documentation that medical and mental health practitioners have received the training reference in this standard either from the agency or elsewhere."

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 7, section D. 3., states, "Medical and mental health care practitioners shall also receive the training mandated for all employees, depending on the practitioner's status at the agency."

State of Iowa Department of Corrections, Iowa Correctional Institution for Women, Policy and Procedures, Chapter 1, In-Service Training, Policy AD-TS-05, page 6-7, section 3. a-l., states, "All employees who may have contact with incarcerated individuals, regardless of the amount of contact, shall be trained on the following information:

- a. IDOC's zero-tolerance policy for sexual violence and sexual harassment;
- b. How to fulfill their responsibilities under IDOC sexual violence and sexual harassment prevention, detection, reporting, and response policies and procedures;
- c. Incarcerated individual's right to be free from sexual violence and sexual harassment;
- d. The right of incarcerated individuals and employees to be free from retaliation for reporting sexual violence and sexual harassment;
- e. The dynamics of sexual violence and sexual harassment in confinement;
- f. The common reactions of sexual violence and sexual harassment victims;
- g. How to detect and respond to signs of threatened and actual sexual violence;
- $\hbox{h. How to avoid inappropriate relationships with incarcerated individuals;}\\$
- i. How to communicate effectively and professionally with incarcerated individuals, including lesbian, gay, bisexual, transgender nonconforming incarcerated individuals;
- j. Such training shall be tailored to the gender of the incarcerated individuals at the employee's facility. The employee shall

receive additional training if the employee is reassigned from an institution that houses only male incarcerated individuals to an institution that houses only female incarcerated individuals, or vice versa;

- k. IDOC shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual violence and sexual harassment policies and procedures. In years that employees don't receive refresher training, IDOC shall provide refresher information on current sexual violence and sexual harassment policies;
- I. IDOC shall document, through employee signature or electronic verification, that employees understand the training they have received."

The facility provided computer generated Specialized PREA Medical and Mental Health Care Standards training. These training records demonstrate the training completed by medical and mental health staff.

115.41 Screening for risk of victimization and abusiveness

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, dated, June 2021
- 3. Iowa Department of Corrections SVP Intake Screening Tool, dated May 2021
- 4. Iowa Department of Corrections Sexual Violence Propensity Assessment Scoring Guide for Offenders, dated 6.14.2021
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, dated, May 2021
- 6. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, dated, May 2022 (revised pre-audit phase)

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselor
- 4. PREA Compliance Manager

Interviews with incarcerated individuals demonstrated each did not answer risk questions honestly as they were unsure why the questions were asked and or what the staff may do with the information.

Formal and informal interviews with staff demonstrated that risk assessments are completed within 72 hours of admission.

Site Review Observation:

Review of 12 incarcerated individual files demonstrated each had received screening within 72 hours of admission, primarily on the day of admission.

Recommendation:

Facility personnel completing Risk Screenings inform residents risk screening questions are asked of them in order to keep them sexually safe in the program in an attempt for incarcerated individuals to answer risk questions, honestly.

(a) The Iowa Correctional Institution for Women PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other Inmates.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 3, section C. 1., states, "All incarcerated individuals shall be assessed immediately upon arrival using the paper SVP-Intake Screening Tool, IS-RO-01 F-2, and shall be assessed during an intake screening for their risk of being sexually abused by other incarcerated individuals or sexually abusive toward other incarcerated individuals. This tool is confidential for staff use only and shall not be self-administered by the incarcerated individual and shall only be administered by the intake staff."

(b) The Iowa Correctional Institution for Women PAQ states the number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates with 72 hours of their entry into the facility was 1137.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 4, section 2., states, "All incarcerated individuals shall receive a Sexual Violence Propensity (SVP) assessment. Intake screening shall ordinarily take place within 72 hours of arrival at the facility."

(c-e) The Iowa Correctional Institution for Women PAQ states the facility conducts risk assessments by using an objective screening instrument. Policy compliance can be found in provision (a) of this standard.

The facility provided an Iowa Department of Corrections SVP-Intake Screening Tool. The tool includes the following:

Sexual Violence Potential

- 1. Has 2 prior incarcerations
- 2. Displays intimidating or aggressive attitude
- 3. Appears prison-wise, highly familiar with prison environment
- 4. Is confirmed or suspected STG
- 5. Has history of criminal charges and/or convictions for sexual related offenses **
- 6. Has prior reports for sexual misconduct, sexual assaults on incarcerated individuals, or assaults on incarcerated individuals or ever been a perpetrator of prior sex abuse **

7. Required to register as a sex offender or convicted of a sex offense

Sexual Victimization Potential

- 1. Unassertive, projects weakness or expresses concern regarding physical or sexual victimization while in prison.
- 2. Age less than 25 or over 65
- 3. Vulnerable to victimization due to nature of crime (hate crime, sexual assault against a child, high profile crime against a person)
- 4. Lives an alternative lifestyle (gay, lesbian, transgender bisexual, fluid, gender non-conforming, questioning, intersex, gender (other than assigned at birth LGBTIQI) What pronouns do you prefer?
- 5. Has been sexually victimized as child.
- 6. Presents as having a mental, physical or developmental disability and warrants immediate Ad Seg placement **
- 7. History of physical or sexual victimization in prison or the community**
- 8. If victim of prior sexual abuse would you like a follow up meeting (at no cost) with the Psychologist?

"INTAKE STAFF, PLEASE COMPLETE THIS FORM WHEN YOU DO THE HEALTH SERVICES FORM. MAKE THE DECISION FOR THE NEED OF A SINGLE CELL. THIS FORM SHOULD THEN BE SENT TO THE PSYCHOLOGIST FOR MENTAL HEALTH SERVICES. THE PSYCHOLOGIST SHALL REVIEW, SIGN OFF AND FORWARD TO CENTRAL RECORDS."

The facility does not detain solely for civil immigration purposes.

(f) The Iowa Correctional Institution for Women PAQ states the policy requires that the facility reassess each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive with 30 days after their arrival at the facility based upon any additional relevant information received since intake was 656.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 4, section 2. a., states, "Within a set time not to exceed 30 days from the incarcerated individual's arrival at an institution, the institution shall reassess the incarcerated individual's SVP code based upon any additional, relevant information received by the institution since the most recent SVP assessment."

The facility provided an Iowa Department of Corrections Sexual Violence Propensity Assessment Scoring Guide for Offenders. The assessment includes the following questions.

- 1. Two or More Felony Incarcerations
- 2. Prior violence within prison, work release, residential facility, or county jail
- 3. Current & past convictions display a pattern of repeated predatory violence (other than sex offenses).
- 4. Sex Offender Past and/or present victim(s) age 14 or older. -- Has a conviction for a sex offense against a victim age 14 or older.
- 5. Intimidating or aggressive attitude.
- 6. Highly familiar with Prison or RCF environment or presents as prison wise or street wise.
- 7. Any history of sexual predatory behavior or sexual assault of offenders.
- 8. Two or more convictions for Serious or Aggravated Misdemeanor Assaults, Domestic Abuse Assaults, or one (1) Felony Class D Willful Injury.
- 9. Felony drug conviction plus confirmed/suspected STG plus two (2) or more felony incarcerations.
- 10. Intellectual/physical disability or severely mentally ill.
- 11. Age or slight physical stature.
- 12. First time incarcerated OR in DCS RCF placement feels threatened/traumatized by prison or RCF.
- 13. Displays sexual orientation in a way that projects vulnerability.
- 14. Conviction for a current or previous sexual offense against a child age thirteen (13) years or under.
- 15. History of sexual violence victimization.
- 16. Unassertive, lacks confidence, projects weakness or fear.
- 17. Nonviolent crime or property crime only (non-habitual).

Revised State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 6, section C. 10., states, "Incarcerated individuals may not be disciplined for refusing to answer questions or not disclosing complete information."

(g) The Iowa Correctional Institution for Women PAQ states the policy requires that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 4, section 2. b., states, "An incarcerated individual's risk level shall be reassessed when warranted due to significant events, a

referral, request, incident of sexual assault or sexual abuse, or receipt of additional information that bears on the incarcerated individual's SVP code."

(h) The Iowa Correctional Institution for Women PAQ states the policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not the inmate has previously experienced sexual victimization; and (d) the inmate's own perception of vulnerability.

115.42 Use of screening information

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-CL-09, dated, September 2020
- 3. Iowa Department of Corrections Sexual Violence Propensity Assessment Scoring Guide for Offenders, dated 6.14.2021
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-CL-02, dated, May 2020
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, dated, May 2021
- 6. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, dated, May 2021
- 7. Post Audit: Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, dated 6.20.2022
- 8. Post Audit: Email communication, Subject: PREA Audit Follow Up SVP Assessment and Access, dated 6.27.2022

Interviews:

- 1. Targeted incarcerated individuals
- 2. Random incarcerated individuals
- 3. Correctional Counselors
- 4. Correctional Counselors

Formal and informal interviews with staff demonstrated incarcerated information was available to all staff who had access to the agency ICON database. The facility was asked to submit a sustainable action plan to ensure sensitive information is safe guarded to applicable staff.

Incarcerated individuals spoke to the intake process being respectable to include search procedures. Targeted incarcerated individuals stated they believed their housing assignments to be appropriate and their considerations to thoughts to safe placement within the facility.

The facility was requested to provide the following action plans:

- Facility Warden to provide a sustainable action plan, addressed to applicable staff and the PREA Auditor, ensuring victims and perpetrators are reassessed after an incident of sexual abuse is alleged/reported.
- Appropriate agency personnel to provide a sustainable action plan, addressed to applicable staff and the PREA Auditor, providing commentary on ensuring dissemination / sensitive information from incarcerated individual risk screening is only available to designated personnel.

Post Audit the facility provided an Iowa Correctional Institution for Women Memorandum, Subject: PREA Action Plans, addressed to Unit Managers, ICIW Captains and ICIW Sergeants, stating, "Change in SVP reassessment regarding a report of Sexual Abuse is alleged/reported.

• Once a report is made regarding Sexual Abuse, a reassessment (SVP) is completed at that time or soon after contrary to after the investigation is completed."

Post Audit: Email communication, Subject: PREA Audit Follow Up – SVP Assessment and Access, to David Southwick, PREA Compliance Manager, from Deputy Warden, stating, "On Wednesday, 6.22.2022, changes were made to ICON privilege levels for the Correctional Officer group. This group no longer has ICON permissions that would allow for access to the SVP assessment." This email is from the lowa Correctional Institution for Women, Deputy Warden.

(a) The Iowa Correctional Institution for Women PAQ states the facility uses information from the risk screening required by \$115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

lowa Department of Corrections Sexual Violence Propensity Assessment Scoring Guide for Offenders, page 9, section B., states, "The assessment shall be utilized for assigning housing units, cells, rooms, and beds for offenders at all custody levels. It should also be utilized in determining programming and work assignments when constant or frequent sight and sound supervision is not possible."

(b) The Iowa Correctional Institution for Women PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each inmate.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 5, section 7, states, "IDOC shall not place lesbian, gay, bisexual, transgender, or intersex incarcerated individuals in dedicated

facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such incarcerated individuals."

(c) The Iowa Correctional Institution for Women PAQ states the agency/facility makes housing and program assignments for transgender, or intersex inmates in the facility on a case-by-case bases.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 5, section C. 3., states, "In deciding whether to assign a transgender or intersex incarcerated individual to a facility for male or female incarcerated individuals, and in making other housing and programming assignments, IDOC shall consider on a case-by-case basis whether a placement would ensure the incarcerated individual's health and safety, and whether the placement would present management or security problems."

- (d) State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 5, section C. 4., states, "Placement and programming assignments for each transgender or intersex incarcerated individual shall be reassessed at least twice each year to review any threats to safety experience by the incarcerated individual."
- (e) State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 5, section C. 5., states, "A transgender or intersex incarcerated individual's own views with respect to his or her own safety shall be given serious consideration."
- (f) State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 5, section C. 6., states, "Transgender and intersex incarcerated individuals shall be given serious consideration."

115.43 Protective Custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, dated, June 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-05, dated, March 2019
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, dated, January 2022 (revised during pre-audit phase)

Interviews:

- 1. Targeted incarcerated individuals
- 2. Random incarcerated individuals
- 3. Correctional Counselors
- 4. Protective Custody Correctional Officers
- 5. PREA Compliance Manager

Interviews with incarcerated individuals demonstrated each were currently in protective custody for the safety of the general population, agreed the placement was justified, wanted to continue their current housing assignment and each stated Unit Managers check on them each Tuesday to discuss their housing assignment.

Interviews with staff demonstrated placement of incarcerated individuals in protective custody housing is typically done only as a result of an allegation and or at the request of the incarcerated individual.

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(a) The lowa Correctional Institution for Women PAQ states the agency has a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless and an assessment of all available alternatives has been made and a determination has been made that there is not available alternative means of separation from likely abusers. The number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment is zero.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 6, section B., states, "individuals at high risk for sexual victimization shall not be placed in involuntary PC housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the incarcerated individual in involuntary PC housing for less than 24 hours while completing the assessment."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-05, page 3, section A. 3., states, "Any use of restrictive housing to protect an incarcerated individual who is alleged to have suffered sexual abuse shall be subject to the requirements of PREA Standard 115.43."

- (b) Revised State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 3, section 4.A.1-6, states, "Housing Assignment
- 1. PC is not a punitive status.

Pending a protective custody (PC) determination by the Classification Committee, the incarcerated individual shall be placed in an administrative segregation status.

- 2. The incarcerated individual shall be interviewed by an intelligence officer (IO) and the results of the interview shall be given to the Committee for PC consideration.
- 3. In the absence of lessor restrictive options, incarcerated individuals placed on PC status may initially be housed in HU1 segregation on a short-term basis.
- 4. Once the Committee assigns an incarcerated individual to PC status, he shall be managed as a PC incarcerated individual consistent with this policy.
- 5. An incarcerated individual in PC may concurrently have a disciplinary detention and/or administrative segregation or other classification status, and therefore shall be subject to the highest restrictions of any his assigned statuses (see IO-HO-05, Administrative Segregation and IO-HO-07, Disciplinary Detention).
- 6. Initial placement of an incarcerated individual in this status will receive all allowable privileges and property in accordance with IS-RO-03- i.e., \$50.00 in weekly commissary."
- (c) The Iowa Correctional Institution for Women PAQ states the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing in the past 12 months, for longer than 30 days while awaiting alternative

placement was zero.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 4, section 8., states, "Incarcerated individuals in PC may request a review by the PCRC at any time. Reviews more frequent than every 30 days are at the sole discretion of the PCRC."

(d) The Iowa Correctional Institution for Women PAQ states from a review of case files of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facilities concern for the inmate's safety, and (b) the reason or reason why alternative means of separation could not be arranged was zero.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 4, section 7., states, "Within seven days of placement, the PCRC shall conduct a PC review to determine the need for continued placement in PC. The status of all incarcerated individuals placed in PC shall be reviewed every seven days for the first two months and every 30 days thereafter to determine whether the reasons for placement still exist."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 4, section 7., states, "Within seven days of placement, the PCRC shall conduct a PC review to determine the need for continued placement in PC. The status of all incarcerated individuals placed in PC shall be reviewed every seven days for the first two months and every 30 days thereafter to determine whether the reasons for placement still exist."

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 8, section b., states, "The assigned Correctional Counselor gathers relevant information regarding the incarcerated individual, to include but not limited to: when the incarcerated individual requested status, when the incident occurred, date of placement, details surrounding incident, status of other incarcerated individual involved, current behavior, and pertinent mental health information, and provides it to the Committee prior to the review. When practical, Committee members will review information before the scheduled review."

(e) The Iowa Correctional Institution for Women PAQ states if an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population. Policy compliance can be found in provision (d) of this standard.

115.51 Inmate reporting

Auditor Overall Determination: Meets Standard

Auditor Discussion

(a) The Iowa Correctional Institution for Women PAQ states the agency has established procedures allowing for multiple internal ways for Inmates to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.

State of lowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, page 1, section, Policy, states, "It is the policy of the IDOC to provide a safe, humane, and secure environment, free from the threat of unwanted sexual behavior for all incarcerated individuals in all IDOC facilities. The IDOC prohibits sexual abuse and sexual harassment of incarcerated individuals through incarcerated individual orientation, screening, assessment, classification, monitoring, counseling, and investigation of alleged sexual violence. The IDOC has a "zero tolerance" position for sexual abuse and sexual harassment of all incarcerated individuals under correctional supervision whether in intuitional, residential, parole, probation and work release status. This policy shall be available to all incarcerated individuals and unless updates are needed this policy shall be reviewed every three years."

Page 6, section c., states, "Send a letter to: (1.) Victim and Restorative Justice Director: Iowa Department of Corrections 510 East 12th Street Des Moines, IA 50319"

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 1, section Purpose, states, "To describe the procedures that shall be used at all Iowa Department of Corrections (IDOC) institutions to ensure sexual misconduct, sexual harassment, or retaliation between staff, contractors, or volunteers and incarcerated individuals does not occur."

The facility provided an Iowa Correctional Institution for Women Handbook. Pages 15-16, section PREA, states, "If you have been a victim of a sexual assault you should report it to staff or send a memo to the Warden or Deputy Warden immediately. You may also report it by sending a letter to:

The Director of Victim Services

510 East 12th Street

Des Moines, IA 50319

Or calling 515.281.3592"

(b) The lowa Correctional Institution for Women PAQ states facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not have a policy requiring inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security. This facility does not detain inmates for civil immigration purposes.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, page 6, section, c. 2., states,

"The Iowa Ombudsman Office

Office of Citizens' Aide/Ombudsman

Ola Babock Miller Building

1112 East Grand Des Moines, IA 50319"

The facility provided a How to Report Allegations of Sexual Violence in an IDOC Prison Posting. The posting states the following:

Any person may report concerns on behalf of an IDOC offender to:

- The Warden or Superintendent
- Any employee Victim and Restorative Justice Director Iowa Department of Corrections 510 East 12th Street Des Moines, IA 50319
- The Iowa Ombudsman Office: Office of Citizens' Aide/Ombudsman Ola Babcock Miller Building 1112 East Grand Des Moines, IA 50319
- Send an email via this website
- (c) The lowa Correctional Institution for Women PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The PAQ states staff are to document allegations received by the end of the shift.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 12, section b-c., state,

- b. "Report by an incarcerated individual, anonymously, or from third parties Any staff member who receives a report of sexual violence or retaliation, whether verbally or in writing from an incarcerated individual or anonymously or from third parties, shall immediately notify the Shift Supervisor and complete an incident report.
- c. "Report by a staff member Any staff member who receives a report of sexual violence, retaliation, or of staff neglect or violation of responsibilities that may have contributed to such incidents whether verbally, in writing, anonymously, or from third parties, or who has other knowledge, suspicion, or information of such incidents shall immediately report it to their supervisor and complete an incident report."

The facility provided a Filed Incident Report. The Incident type was Offender on Offender Precursor Behavior/Sexual Harassment. The allegation was verbally reported to staff and demonstrates the agency respond to verbal reports from Offenders.

(d) The Iowa Correctional Institution for Women PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Staff are informed of these procedures in the following ways.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 7, section A. 5., states, "Each institution shall provide a method for staff to privately report sexual violence against incarcerated individuals. To include calling the Ombudsmen at 1.888.426.6283 or sending them correspondence at Office of Ombudsman, Ola Babcock Miller Building, 1112 East Grand, Des Moines, Iowa 50319."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 6, section 4., states, "Each institution shall provide a method for staff to privately report sexual violence against incarcerated individuals."

The facility provided a ICIW 3rd Party Reporting Posting. The posting states: Zero Tolerance for Sexual Violence, Break the Silence – Report suspected sexual violence. Contact the warden's office: 515.725.5042 or email IDOC: www.doc.state.ia.us

On 4.25.2022 at 3:13 pm, this Auditor phoned 515.725.5042 and received the following message: "You have reached the lowa Correctional facility for women. For the office of the Warden, press 2."

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Iowa Correctional Institution for Women PAQ
	2. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-OR-06,
	dated January 2022
	Interviews:
	1. Random incarcerated individuals
	2. Targeted incarcerated individuals
	3. PREA Compliance Manager
	Incarcerated individuals interviewed were aware of the grievance procedures and understood they could complete a
	grievance, if necessary. Incarcerated individuals interviewed could identify the dining hall had a grievance box, knew they
	could file a grievance anonymously and stated staff got back with them quickly.
	(a) The Iowa Correctional Institution for Women PAQ states the agency does not have an administrative procedure for
	dealing with Inmate grievances regarding sexual abuse.
	State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-OR-06, page
	4-5, states, "Allegations of incarcerated individual on incarcerated individual sexual abuse or sexual assault or staff,
	contractor or volunteer sexual misconduct or sexual harassment, or retaliation are not processed as a grievance. However, if
	an incarcerated individual submits a complaint to the grievance officer, it will be sent to the Inspector General's Office in
	Central Office for investigation. Refer to IDOC Policy PREA-01, Incarcerated Individual PREA Information for reporting processes."
	Through such reviews, the facility meets the standard requirements.

115.53 Inmate access to outside confidential support services

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
- 4. Confidential Support Services Posting, not dated
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, dated, August 2021
- 6. PREA Report Sexual Abuse and Violence Posting, not dated
- 7. Iowa Correctional Institution for Women Handbook, dated July 2021
- 8. Memorandum of Understanding with Polk County Crisis and Advocacy Services, dated 9.26.2019
- 9. Post Audit: ICIW PREA Reporting Poster, not dated
- 7. Post Audit: Email communication, Subject: Free Phone Call Provided, dated 6.30.2022

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors

Staff and incarcerated individuals interviewed informally and formally were aware of outside reporting agencies and spoke to the information receiving white folders at intake with victim service information and information being posted throughout the facility.

Site Review Observation:

During the facility tour, testing of incarcerated individual phones demonstrated outside reporting numbers were not free for residents.

The facility was requested to provide the following action plans:

- The facility to provide a free telephone number to victim advocates for emotional support services. The facility to provide postings of mailing addresses and telephone numbers of local State, or national victim advocacy or rape crisis organizations.
- The facility to provide incarcerated individuals notification, via kiosk if this makes the most sense, regarding advocate phone numbers, at no cost to residents.
- The facility to provide the Auditor advocate posting/flyer which includes mailing addresses and telephone numbers of local, State, or national victim advocacy or rape crisis organization and notification of information provided to incarcerated individuals regarding victim contact information, without cost.

Post Audit: The facility provided an updated PREA No Means No Creating a Culture of Sexual Safety Advocate flyer. The flyer states, "If you or someone you know has been a victim of offender sexual abuse, report it immediately in any of the following ways; tell a staff member, send a kiosk message to the Warden or Deputy Warden, write the:

Director of Victim Services Office of Citizens' Aide

510 East 12th Street Ola Babcock Miller Building

Des Moines, IA 50319 1112 East Grand

515.281.3592 Des Moines, IA 50319

Polk County Crisis Services (free call) 515.286.3600 (outside agency)"

Post Audit: Email communication, Subject: Free Phone Call Provided, to David Southwick PCM, from Correctional Counselor, stating, "I was asked to have an incarcerated individual check to see if the following number was free of charge to them. Polk County Crisis Line 515.286.3600. The incarcerated individual that completed this task stated that the phone call was free for her."

- (a) The Iowa Correctional Institution for Women PAQ states the facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by:
- Giving inmates (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) of local, State, or national victim advocacy or rape crisis organizations.
- Does not give inmates mailing addresses and telephone number (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes; and
- Enables reasonable communication between inmates and these organizations, in as confidential manner as possible.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, Policy PREA-02, page 11, section 4. a., states, "The Each institution shall provide incarcerated individuals with access to outside victim advocates for emotional support services related to sexual violence by giving incarcerated individuals mailing addresses and telephone numbers. The institution shall enable reasonable communication between incarcerated individuals and these organizations and agencies, in as confidential a manner as possible."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 7, section 13.a., states, "The institution shall provide incarcerated individuals with access to outside victim advocates for emotional support services related to sexual violence by giving incarcerated individuals mailing addresses and telephone numbers. The institution shall enable reasonable communication between incarcerated individuals and these organizations and agencies, in as confidential a manner as possible."

The facility provided a PREA Report Sexual Abuse and Violence Posting. This posting is placed above Offender phones and states: If you or someone you know has been the victim of offender sexual abuse, report it immediately in any of the following ways: tell a staff member, send a kiosk message to the Warden or Deputy Warden, write or call:

Director of Victim Services Office of Citizens' Aide
510 East 12th Street Ola Babcock Miller Building

Des Moines, IA 50319 1112 East Grand 515.281.3592 Des Moines, IA 50319

The facility provided an Iowa Correctional Institution for Women Handbook. Page 20-21, state: "The Iowa Department of Corrections has a ZERO TOLERANCE policy for sexual abuse and sexual harassment. Report sexual abuse, sexual harassment, and sexual misconduct! Some Ways to keep yourself safe:

- · Choose your friends wisely. Look for people who are involved in groups and activities that interest you.
- Avoid being isolated where staff can't see you, and do not go into "off limit" areas.
- Do not allow another resident to be your "protector." They will want something in return.
- Do not accept gifts, loans, or favors from others. Most come with strings attached.
- Do not borrow, loan, or trade property or canteen with others.
- Do not let someone pull you into sharing secrets.
- Carry yourself in a confident manner.
- Be direct, firm, and say "no" when asked to do something you know is wrong.
- Trust your instincts. If you sense a situation is dangerous, it probably is.

If you have been a victim of a sexual assault, report it immediately.

Ways to Report:

- Tell a staff member you trust.
- Write to Victim and Restorative Justice Director Iowa Department of Corrections East 12th Street Des Moines, IA 50319
- Write the Ombudsman Ola Babcock Miller Building 1112 East Grand Des Moines, IA 50319
- Have a family member complete a third-party report through the IDOC website.

In Case of a Sexual Assault: Do not wash, drink, change your clothing or use the restroom. You may be taken to the local hospital or the health care unit for examination and evidence collection. You have the right to speak with a victim advocate and be protected from further victimization. You would be encouraged to seek mental health counseling. There are consequences for the perpetrator of sexual violence, charges may be filed, and discipline would result. If you have any questions regarding staying safe, PREA or what sexual assault is, contact your Counselor."

(b) The Iowa Correctional Institution for Women PAQ states the facility informs Inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, page 7, section 4., states, "Reports of unwanted sexual behavior shall be forwarded to authorities in accordance with Iowa mandatory reporting laws."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 12, section b., states, "The institution shall inform incarcerated individuals, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of sexual violence will be forwarded to authorities in accordance with mandatory reporting laws."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 7, section 13.b., states, "The institution shall inform incarcerated individuals, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of sexual violence will be

forwarded to authorities in accordance with mandatory reporting laws."

(c) The Iowa Correctional Institution for Women PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide inmates with emotional support services related to sexual abuse.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 12, section c., states, "The institution PREA Compliance Manager/PREA Coordinator shall enter into or attempt to enter into a memorandum of understanding or other agreement with community rape crisis service providers. Each institution shall maintain copies of agreements or documentation showing attempts to enter into such agreements."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 7, section 13.c., states, "The institution PREA Compliance Manager/PREA Coordinator shall enter into or attempt to enter into a memorandum of understanding or other agreement with community rape crisis service providers. Each institution shall maintain copies of agreements or documentation showing attempts to enter into such agreements."

The facility provided a Memorandum of Understanding with Polk County Crisis and Advocacy Services. Page 1, section Purpose, states, "To establish written procedures that are in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the exchange of information and the coordination of efforts and assets between the Iowa Correctional Institution for Women (ICIW) and Polk County Crisis and Advocacy Services (PCCAS). This agreement is in place until 6.30.2022.

On 5.14.2022 at 2:50 pm, this Auditor contacted Polk County Crisis and Advocacy Services at 2309 Euclid Avenue, Des Moines, IA 50310, phone number 515.286.3600. After proper introductions and the reason for the call, the operator stated she worked for the statewide hotline and the Crisis center calls rolls to the Statewide hotline number during off hours. The operator stated if a resident were to call the center, they would just need their name and a good call back number and they would get an advocate in touch with the advocate.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Iowa Correctional Institution for Women PAQ
	2. Report Sexual Assault Posting, not dated
	3. Iowa Department of Corrections, Visitor Application, dated April 2019
	4. ICIW 3rd Party Reporting Posting, not dated
	Interviews:
	1. Random incarcerated individuals
	2. Targeted incarcerated individuals
	3. Correctional Counselors
	4. Targeted staff
	5. PREA Compliance Manager
	Incarcerated individuals and staff interviewed demonstrated their reporting knowledge of third-party reporting stating that family members, friends and or friends inside the facility could report sexual harassment or sexual abuse allegations.
	Site Review Observation:
	During the tour of the visitation area, standardized outside reporting flyers with PREA information were available to include third party reporting information. In addition, inmates have access to kiosks. Hotline numbers and third-party information were posted throughout the facility.
	(a) The Iowa Correctional Institution for Women PAQ states the facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. The agency publicly distributes information on how to report Inmate sexual abuse or sexual harassment on behalf of Inmates. The PREA Coordinator, stated, on the PAQ, "Posters are in the Visiting Room informing them of the phone #, there is also information in the ISP as well as the IDOC websites."
	The facility provided a ICIW 3rd Party Reporting Posting. The posting states: Zero Tolerance for Sexual Violence, Break the Silence – Report suspected sexual violence. Contact the warden's office: 515.725.5042 or email IDOC: www.doc.state.ia.us
	The facility provided an Iowa Department of Corrections, Visitor Application. Page 2, bottom, states, "BREAK THE SILENCE – Iowa DOC has a zero tolerance for sexual violence of any kind. If you are told about or are concerned about sexual violence committed against any person in an IFOC prison, please contact the Warden immediately."

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Counselors
- 4. PREA Compliance Manager

Interviews with the facility staff and incarcerated individuals demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.

Site Observations:

Staff reporting documentation of incarcerated individual information, incident reports and investigations being completed in the facility database demonstrated reports of allegation are addressed timely. The PREA Compliance Manager was able to access reported allegation of abuse and or harassment quickly by accessing the agency database.

(a) The Iowa Correctional Institution for Women PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Inmates or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 12, section c., state, "Report by a staff member - Any staff member who receives a report of sexual violence, retaliation, or of staff neglect or violation of responsibilities that may have contributed to such incidents whether verbally, in writing, anonymously, or from third parties, or who has other knowledge, suspicion, or information of such incidents shall immediately report it to their supervisor and complete an incident report."

(b) The Iowa Correctional Institution for Women PAQ states, apart from reporting to designated supervisors or official and designated state or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 8, section 9, states, "All sexual violence investigations are confidential under Iowa statute and administrative rules. Other than reporting to supervisors or the institution's sexual violence investigator or PREA Compliance Manager/PREA Coordinator, staff shall not reveal any information related to a report to anyone other than to the extent necessary, as specified in IDOC policy, to make treatment, investigation, and other security or management decisions."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 6, section 8, states, "All sexual violence investigations are confidential under Iowa statute and administrative rules. Other than reporting to supervisors or the institution's sexual violence investigator or PREA Compliance Manager/PREA Coordinator, staff shall not reveal any information related to a report to anyone other than to the extent necessary, as specified in IDOC Policy, to make treatment, investigation, and other security or management decisions."

- (c) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 8, section 9, states, "All sexual violence investigations are confidential under Iowa statute and administrative rules. Other than reporting to supervisors or the institution's sexual violence investigator or PREA Compliance Manager/PREA Coordinator, staff shall not reveal any information related to a report to anyone other than to the extent necessary, as specified in IDOC policy, to make treatment, investigation, and other security or management decisions."
- (d) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 7, section C. 2., states, "Medical and mental health practitioners shall obtain informed consent from incarcerated individual before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the incarcerated individual is under the age of 18. Electronic consent is recorded in Medical ICON."

115.62 Agency protection duties Auditor Overall Determination: Meets Standard **Auditor Discussion** Document Review: 1. Iowa Correctional Institution for Women PAQ 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021 Interviews: 1. Targeted incarcerated individuals 2. PREA Compliance Manager 3. Facility Investigator Incarcerated individuals interviewed who had reported allegations of abuse, concurred allegations were responded to promptly and thoroughly and were satisfied with the facilities response. Interviews with the targeted incarcerated individuals, PREA Compliance Manager and facility investigator demonstrated facility staff act promptly and responds properly at the discovery of any incident involving sexual harassment and sexual abuse. (a) The Iowa Correctional Institution for Women PAQ states when the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the Inmate. In the past 12 months, the facility reports zero Inmates were subject to substantial risk of imminent sexual abuse. Upon discovery of Inmate being subject to substantial risk, the facility immediately separates the victim from the perpetrator, made notification and completed incident reporting requirements. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 7, section 2, states, "When an institution learns that an incarcerated individual is subject to a substantial risk of imminent sexual violence, it shall take immediate action to protect the incarcerated individual." State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy

PREA-03, page 11, section F. 1., states, "When an institution learns that an incarcerated individual is subject to a substantial

risk of imminent sexual violence, it shall take immediate action to protect the incarcerated individual."

115.63 Reporting to other confinement facilities

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
- 4. Warden Report PREA Notification, dated 1.27.2022
- 5. Warden t Department Head Letter, dated 1.28.2022

Interviews:

1. Warden

The interview with the Warden demonstrated that she was aware that upon receiving an allegation that an inmate was sexually abused while confined at another facility, she had the responsibility to notify the head of the facility where the allegation occurred. The Warden stated she would begin an internal investigation and keep in contact with the facility in question until the investigation was completed.

Site Review Observation:

The facility had had one reported allegations of sexual abuse while confined at another facility.

(a) The lowa Correctional Institution for Women PAQ states the agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received one allegation that an inmate was abused while in confinement at another facility. Copies of letters are stored in the IDOC Sexual Violence Investigation Database.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section 1. a., states, "Upon receiving an allegation that an incarcerated individual was sexually abused, or subjected to staff, contractor, or volunteer sexual misconduct while confined at another facility, the Warden shall immediately notify the Deputy Director of Institution Operations/Designee. The Deputy Director of Institution Operations/Designee shall notify the facility or appropriate office of the agency where the alleged abuse occurred. The reporting facility shall also initiate the Wardens notification via the database to the receiving facility that an incident occurred, accordingly."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 7, section B. 1., states, "Upon receiving an allegation that an incarcerated individual was sexually abused by another incarcerated individual while confined at another facility, the Warden shall immediately notify the Deputy Director of Institution Operations/Designee. The Deputy Director of Institution Operations/Designee shall notify the facility or appropriate office of the agency where the alleged abuse occurred."

The facility provided a completed PREA Notification – Reporting to other confinement facilities notification. The notification is a set template, outlining the following: (personal identifiers purposely left out of this report)

- · Receiving Institution
- Receiving Address
- Date
- Who reported the allegation
- Warden contact information

The facility provided a completed email notification from the PREA Compliance Manager/Sexual Violence Investigator addressed to the receiving institution attaching the letter from the Warden addressed to the Department Head of the receiving institution.

(b) The Iowa Correctional Institution for Women PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 7, section B. 2., states, "Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation."

(c) The Iowa Correctional Institution for Women PAQ states the facility documents that it has provided such notification within

72 hours of receiving the allegation.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section c., states, "The Deputy Director of Institution Operations/Designee shall document that such notification has been provided."

(d) The Iowa Correctional Institution for Women PAQ states facility policy requires that allegations received from other agencies or facilities investigated in accordance with the PREA standards. In the last 12 months, there have been one allegation of sexual abuse the facility received from other facilities.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section d., states, "The Deputy Director of Institution Operations/Designee shall ensure that the allegation is investigated in accordance with the requirements of the PREA standards."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 8, section 4., states, "The Deputy Director of Institution Operations/Designee shall ensure that the allegation is investigated in accordance with the requirements of the PREA standards."

115.64 Staff first responder duties

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, dated, August 2021
- 5. Completed ICIW 21-025 Incident Report

Interviews:

- 1. Correctional Counselors
- 2. PREA Compliance Manager

Informal and formal interviews with staff demonstrated each were aware of their first responder responsibilities. Staff stated reporting information is posted throughout the facility. Staff stated they would have one officer preserve the area where the abuse took place, separate the victim and suspect in an area where they could not eat, drink, wash, or destroy evidence. Each staff interviewed stated they would make proper notifications to supervisory staff and complete a report documenting details of any incident or reporting allegation.

Site Review Observation:

Documentation review of the allegations of sexual abuse reported, each demonstrated staff responded accurately and promptly. The facility staff are aware of the facility's coordinated response to ensure all protocols are followed as designed.

(a) The Iowa Correctional Institution for Women PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, 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, 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.

In the past 12 months, 13 allegations occurred where an inmate was sexually abused. In the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was 13. In the past 12 months, there were zero allegations where staff were notified within a time period that still allowed or the collection of evidence.

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating was zero.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 11, section c., states, "If it is alleged that a sexual abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and perpetrator not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 11, section c., states, "If it is alleged that the sexual abuse occurred within a time period that still allows for the collection of physical evidence, 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."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-01, page 7-8, section E. 2., states, "If applicable to the circumstances, the alleged incarcerated individual victim shall be advised by the employee receiving the report or Shift Supervisor that showering or body cleaning, or if alleged abuse was oral, drinking or brushing could damage or destroy evidence."

(b) The Iowa Correctional Institution for Women PAQ states the facility's' policy requires that if the first staff responder is not

a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero. Policy compliance can be found in provision (a) of this standard.

The facility provided a completed ICIW 21-025 Incident Report. This report demonstrates first responder actions of moving the abuser from the victim until the incident can be investigated.

115.65 Coordinated response

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. Sexual Assault Checklist Staff-On-Incarcerated Individual, not dated
- 3. Sexual Assault Checklist Incarcerated Individual-On-Incarcerated Individual, not dated
- 4. Allegation of Sexual Misconduct Staff-On-Incarcerated Individual, dated February 2021
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 6. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021

Interviews:

- 1. Correctional Counselors
- 2. PREA Compliance Manager

Interviews with the PREA Compliance Manager and facility staff demonstrated the response to allegations of sexual assault is written to coordinate actions taken in response to sexual abuse and sexual harassment incidents.

Site Review Observation:

Review of the Sexual Assault Checklist demonstrates clear direction to staff to ensure first responder duties are fulfilled.

(a) The Iowa Correctional Institution for Women PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 12, section C. 1., states, "The IDOC shall develop a consistent statewide process for reporting and investigating incidents of sexual misconduct, sexual harassment, retaliation by staff, contractors, and volunteers, or staff neglect or violation of responsibilities that may have contributed to such incidents. This process shall include multiple points of reporting, trained investigators, and a consistent investigative process."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 8, section C. 1., states, "The IDOC shall develop a consistent statewide process for reporting and investigating incidents of sexual violence, retaliation, or staff neglect or violation of duty that may have contributed to such incidents. This process shall include multiple points of reporting for incarcerated individuals and staff, specially trained investigators, and a consistent investigative process."

The facility provided three individual coordinated response documents. Individual information for each is as follows.

- 1. Sexual Assault Checklist Staff-On-Incarcerated Individual, pages 1-2, state the following instruction steps: "All allegations or events or verbal or physical staff, contractor, or volunteer sexual misconduct with offenders are to be reported immediately both internally and to IGO in Central Office. This checklist pertains to incidents or allegations of recent sexual assault or sexual misconduct on an offender by staff, contractor, or volunteer."
- a. Care of Victim
- First Responders
- To Health Services
- To Community Hospital
- Sexual Assault Kit
- Housing
- · Confidential counseling
- b. Address Alleged Perpetrator
- c. Notifications
- d. Evidence
- 2. Sexual Assault Checklist Incarcerated Individual-On-Incarcerated Individual, pages 1-2, state the following instruction steps: All allegations or events of incarcerated individual-on-individual sexual abuse, assault, or precursor behavior are to be reported immediately both internally and to IGO in Central Office. This checklist pertains to incidents or allegations of recent sexual assault on an incarcerated individual by incarcerated individual(s)."
- a. Care of Victim
- First Responder
- To Health Services

- To Community Hospital
- Sexual Assault Kit
- Housing
- b. Handing of Perpetrator
- To Health Services
- To Community Hospital
- c. Notifications
- d. Evidence
- 3. Allegation of Sexual Misconduct Staff-On-Incarcerated Individual, pages 1-2, state the following instruction steps: All allegations evidence, or events of staff contractor, or volunteer sexual misconduct with incarcerated individuals including sexual verbal statements, are to be reported immediately both internally and to IGO in Central Office. This checklist pertains to the receipt of any kind of information that indicates a staff member, contractor, or volunteer may be in an inappropriate relationship or had sexual contact with an incarcerated individual or may have committed sexual harassment."
- a. Separation of Staff, Contractor or Volunteer and Incarcerated Individual
- b. Notifications
- c. Evidence

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	lowa Correctional Institution for Women PAQ
	2. 2021-2023 Collective Bargaining Agreement Between the State of Iowa and The American Federations of State, County, and Municipal Employees, Council 61 AFL-CIO
	3. 2021-2023 Collective Bargaining Agreement between State of Iowa and UE Local 893 Iowa United Professionals Social
	Service Unit, effective 7.1.2021 to 6.30.2023
	(a) The lowa Correctional Institution for Women PAQ states the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.
	The facility provided the 2021-2023 Collective Bargaining Agreement Between the State of Iowa and The American
	Federations of State, County, and Municipal Employees, Council 61 AFL-CIO and 2021-2023 Collective Bargaining
	Agreement between State of Iowa and UE Local 893 Iowa United Professionals Social Service Unit, effective 7.1.2021 to 6.30.2023.
	Through such reviews, the facility meets the standard requirements.

115.67 Agency protection against retaliation

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021

Interviews:

1. PREA Compliance Manager

Interviews PREA Compliance Manager demonstrated that he would complete retaliation monitoring in the Retaliation Monitoring database, documenting checks every two weeks. The PREA Compliance Manager stated he would initiate contact with incarcerated individuals after an allegation of sexual abuse, explain the retaliation procedures and monitoring typically two weeks after the 90 days to ensure the situation was safe to stop such monitoring.

On Site Observation:

The PREA Compliance Manager demonstrated how the Retaliation Monitoring database is designed and the entry of biweekly entries to include notifications to applicable staff to ensure entries were timely or a reminder would be generated by the database.

115.67

(a) The Iowa Correctional Institution for Women PAQ states the agency has 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. The agency designates the Captain/PREA Compliance Manager-Security, Correctional Counselor/Assistant PREA Compliance Manager-Treatment and Assistant PREA Compliance Manager, Training Manager.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 10, section 4., states, "Staff shall not retaliate upon knowledge of sexual violence or precursor behavior allegations."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 23, section L. 1., states, "The institution shall protect all incarcerated individuals and staff who report sexual violence or cooperate with investigations from retaliation by other incarcerated individuals or staff and shall designate which staff members or institution departments are charged with monitoring retaliation."

- (b) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 23, section L. 2., states, "The institution shall employ multiple protection measures, such as housing changes or transfers for incarcerated individual victims or perpetrators, removal of alleged staff aggressors or incarcerated individual perpetrators from contact with victims, and emotional support services for incarcerated individuals or staff who fear retaliation for reporting or cooperating with investigations."
- (c) The Iowa Correctional Institution for Women PAQ states the facility monitors the conduct or treatment of Inmates or staff who reported sexual abuse and of Inmates who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Inmates or staff. The facility will monitor conduct or treatment until the Inmate is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had two incidents of retaliation. The facility was tracking Offender on Offender retaliation. Both cases were closed as unsubstantiated.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 23-24, section 3., states, "For at least 90 days following a report of sexual violence, the institution shall monitor the conduct and treatment of incarcerated individuals or staff who reported the sexual violence and of incarcerated individuals who were reported to have suffered sexual violence to see if there are changes that may suggest possible retaliation by incarcerated individuals or staff, and shall act promptly to remedy any such retaliation. The institution shall monitor any incarcerated individual disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The institution shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need."

- (d) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 24, section 4., states, "In the case of incarcerated individuals, such monitoring shall also include periodic status checks."
- (e) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 24, section 5., states, "If any other individual who cooperates with an investigation expresses a fear of

retaliation, the institution shall take appropriate measures to protect that individual against retaliation."

(f) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 24, section 6., states, "The obligation to monitor shall terminate if IGO determines that the allegation is unfounded."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 24, section 7., states, "The institution shall develop procedures to implement the protection against retaliation requirements and shall document all measures taken and monitoring checks. Tracking for retaliation shall be entered in the PREA Investigation Database."

Through such reviews of the agency Retaliation Monitoring database, the facility exceeds the standard requirements.

115.68 Post-allegation protective custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-05, dated, March 2019
- 3. State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, dated, September 2021

Interviews:

- 1. Random incarcerated individuals
- 2. Targeted incarcerated individuals
- 3. Correctional Officers
- 4. Correctional Counselors
- 5. Unit Managers
- 6. PREA Compliance Manager

Incarcerated individual interviews demonstrated that each are placed in protective custody typically at their own choosing and or during investigations to keep inmates safe.

Interviews with facility staff demonstrated that the protective custody for incarcerated individuals only occurs when absolutely necessary and never solely as a means for inmates who identify as LBGTQI.

Site Review Observation:

Applicable incarcerated individuals are placed in isolation cells in protective housing either during an investigation or at their own request.

(a) The lowa Correctional Institution for Women PAQ states the agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. The number of inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement was zero. From a review of case files of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facility's concern for the inmate's safety, and (b) the reason or reasons why alternative means of separation could not be arranged was one. If an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-05, page 3, section A. 3., states, "Any use of restrictive housing to protect an incarcerated individual who is alleged to have suffered sexual abuse shall be subject to the requirements of PREA Standard 115.43."

State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-HO-06, page 16, section 4., states, "Institutional procedures shall outline staff who review required documentation on a routine, regular basis to determine whether the required information is being properly documented, whether formal rounds are being performed in accordance with established procedure, if there are gaps in scheduled activities/services, trends in unit activity, etc. The designated supervisor shall take the necessary steps to resolve any identified discrepancies or deficiencies in documentation. The Unit Officer shall maintain electronic documentation on the Elog or ICON: Generic Notes."

115.71 Criminal and administrative agency investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
- 4. State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Major Discipline Report Procedures, Policy IO-RD-03, dated, May 2021
- 5. ICIW 19-040 Substantiated Staff Misconduct referred for possible prosecution
- 6. ICIW 19-018 Substantiated Staff Misconduct referred for possible prosecution

Interviews:

- 1. Targeted incarcerated individuals
- 2. Facility Investigator
- 3. PREA Compliance Manager

Interviews with the facility investigator demonstrated she had completed specialized investigator training. The investigator clearly articulated processes required during an investigation, to include the notification requirements to victims. Notifications to victims are documented in the agency ICON database.

Site Review Observation:

Onsite review of four administrative investigations demonstrated each were completed thoroughly and within 30 days of the initial report. Each investigation included interviews with victims, abusers, witnesses and staff in the area where the allegation took place.

(a) The Iowa Correctional Institution for Women PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 12, section 2. b., states, "Assign specially trained sexual violence investigators and manage all sexual violence investigations, allegations, and incidents of sexual misconduct, sexual harassment, and retaliation, or that indicate a personal relationship by staff, contractors, or volunteers with incarcerated individuals. Investigations shall be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 8, section 2. b-c., state,

- a. "Assign specially trained sexual violence investigators and manage all sexual violence investigations, allegations, and incidents of sexual violence or retaliation. Investigations shall be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.
- b. Determine when the evidence of incarcerated individual sexual violence or retaliation is sufficient for criminal prosecution and complete county attorney referrals."
- (b) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 8, section J. 1., states, "In addition to the general training provided to all employees, the Deputy Director of Institution Operations shall ensure that, to the extent IDOC conducts sexual violence investigations, its sexual violence investigators have received specialized training in conducting such investigations in confinement settings."
- (c) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 8-9, section 3. a-d., state,
- a. "Gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data."
- b. Interview alleged victims, suspected perpetrators, and witnesses;
- c. Review prior complaints and reports of sexual violence involving the suspected perpetrator.
- d. Include an effort to determine whether staff actions or failures to act contributed to the abuse."
- (d) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section J. 6., states, "When the quality of evidence appears to support criminal prosecution, the investigators shall conduct compelled interviews only after the Deputy Director of Institution Operations has determined, including but not limited to consultation with prosecutors, if compelled interviews may be an obstacle for subsequent criminal prosecution."

- (e) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section J. 7., states, "The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as incarcerated individual or staff. IDOC shall not require an incarcerated individual who alleges sexual violence submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation."
- (f) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section J. 8., states, "The investigators shall prepare a final written report that includes a description of the physical, testimonial, and documentary evidence, the reasoning behind credibility assessments, and investigative facts and findings. The report shall be provided to the Deputy Director of Institution Operations, and Warden. The report shall be a confidential record."
- (g) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 9, section J. 9., states, "IDOC shall make best efforts to ensure that criminal investigations by outside agencies are to be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and copies of all documentary evidence are attached where feasible."
- (h) The lowa Correctional Institution for Women PAQ states there has been two allegations of conduct that appears to be criminal that was referred for prosecution, since the last audit date.

The facility provided two substantiated staff sexual misconduct investigations. Each investigation was referred the Polk and Black Hawk County Attorney offices for possible prosecution.

(i) The Iowa Correctional Institution for Women PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 10, section 11., states, "The institution and IGO shall retain all written sexual violence investigation reports for as long as the alleged perpetrator is incarcerated or employed by the agency, plus five years."

- (j) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 10, section 12., states, "The departure of the alleged perpetrator or victim from the employment or control of IDOC shall not provide a basis for terminating a sexual violence investigation."
- (k) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 10, section 13., states, "IDOC shall make best efforts to ensure that any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements."
- (I) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 10, section 13., states, "When outside agencies investigate sexual violence, IDOC shall cooperate with outside investigators and shall endeavor to remain informed and keep the Deputy Director of Institution Operations informed about the progress of the investigation."

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Iowa Correctional Institution for Women PAQ
	2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
	3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
	Interviews:
	1. Facility Investigator
	The interview with the facility investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.
	(a) The Iowa Correctional Institution for Women PAQ states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.
	State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 19, section 13., states, "IDOC shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual violence are substantiated."
	State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 10, section 15., states, "IDOC shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual violence are substantiated."

115.73 Reporting to inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, dated, August 2021
- 4. ICIW 21-036 Unfounded Investigation, False Report
- 5. ICIW 21-009 Substantiated Investigation
- 6. Closure Letters (2)

Interviews:

1. Facility Investigator

Interviews with the facility investigator demonstrated notification requirements to victims was given verbally and in writing. Documentation of notifications are documented in the agency ICON database used for investigations.

Site Review Observation:

Review of investigations demonstrated incarcerated individuals are notified of investigation outcomes.

(a) The Iowa Correctional Institution for Women PAQ states the agency has a policy requiring that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months was 13. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation was 54.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 20, section H. 1., states, "Following an investigation into an allegation of incarcerated individual sexual misconduct the sexual violence investigator shall inform the incarcerated individual victim as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded, using PREA-02 F-4, Investigator's Closure Letter to Incarcerated Individual."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 20, section I. 1., states, "Following an investigation into an allegation of sexual abuse the sexual violence investigator shall inform the incarcerated individual victim as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded, using PREA-03 F-3, Investigator's Closure Letter to Incarcerated Individual."

The facility provided two investigations, documenting "...were notified verbally of the... finding and were issued closure letters."

- (b) The Iowa Correctional Institution for Women PAQ states If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the Inmate as to the outcome of the investigation is not applicable.
- (c) The lowa Correctional Institution for Women PAQ states following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently does inform the Inmate (unless the agency has determined that the allegation is unfounded) whenever:
- The staff member is no longer posted within the Inmate's unit;
- The staff member is no longer employed at the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility."
- 1. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 20, section 3. a-d, states, "Following a substantiated or unsubstantiated investigation of an allegation of staff sexual misconduct, the institution shall subsequently inform the incarcerated individual victim whenever:
- a. The staff member is no longer posted within the incarcerated individual's unit;
- b. The staff member is no longer employed at the facility;
- c. The institution learns that the staff member has been indicted on a charge related to sexual misconduct within the facility;
- d. The institution learns that the staff member has been convicted on a charge related to sexual misconduct within the facility."

The facility provided an unsubstantiated investigation and the closure notice documented in the agency database. (Information regarding the investigation and closure notices are intentionally left out of the report for confidentiality purposes.)

(d) The Iowa Correctional Institution for Women PAQ states following an inmate's allegation that he or she has been sexually abused by another Inmate in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. There were zero criminal charges, indictments or convictions for sexual abuse in the past 12 months for Offender on Offender Abuse.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 21, section 3. b., states, "Following a substantiated or unsubstantiated investigation of an allegation of sexual abuse, the institution shall subsequently inform the incarcerated individual victim whenever; b., The institution learns that the alleged perpetrator has been convicted on a charge related to sexual abuse within the facility."

(e) The lowa Correctional Institution for Women PAQ states the agency has a policy that all notifications to inmates described under this standard are documented. In the past 12 months, there has been zero notifications to an inmate, pursuant to this standard.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 20, section 4., states, "All such notifications or attempted notifications shall be documented."

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-03, page 21, section 3. c., states, "All such notifications or attempted notifications shall be documented."

(f) State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 20, section 5., states, "IDOC's obligation to report shall terminate if the incarcerated individual is released from the IDOC's custody."

115.76 Disciplinary sanctions for staff

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. Email notification of staff resigning

Interviews:

1. PREA Compliance Manager

Interview with the PREA Compliance Manager demonstrated the employee would be placed on Administrative Leave until the investigation was completed. Depending on the outcome, would depend on disciplinary action that would take place.

Site Review Observation:

In the last 12 months, the facility did not have any staff who were disciplined for violation of an agency sexual abuse or sexual harassment policy.

115.76

(a) The Iowa Correctional Institution for Women PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 20-21, section I. 1., states, "Staff shall be subject to disciplinary sanctions up to and including termination for violating IDOC policies relating to sexual misconduct, sexual harassment, retaliation, or for any neglect or violation of duty that may have contributed to such incidents."

(b) The lowa Correctional Institution for Women PAQ states in the last 12 months, there has been one staff from the facility that had violated agency sexual abuse or sexual harassment policies. The investigation was referred for possible prosecution and the employee resigned.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 21, section I. 2., states, "Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual misconduct."

The facility provided email notifications stating, "staff XXXX XXXX resigned, effective immediately."

(c) The Iowa Correctional Institution for Women PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 21, section I. 3., states, "Disciplinary sanctions for violations of IDOC policies relating to sexual misconduct, sexual harassment, retaliation, or for any neglect or violation of duty that may have contributed to such incidents shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories."

(d) The lowa Correctional Institution for Women PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, one staff have been terminated for sexual abuse or harassment.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 21, section I. 4., states, "All terminations for violations of IDOC policies relating to sexual misconduct, sexual harassment, retaliation, or for any neglect or violation of duty that may have contributed to such incidents or resignations by staff who would have been terminated if not for their resignation, shall be referred for criminal prosecution by the Deputy Director of Institution Operations when the evidence is sufficient for a criminal referral, and by the appropriate institution management team member to any relevant licensing bodies."

115.77 Corrective action for contractors and volunteers Auditor Overall Determination: Meets Standard **Auditor Discussion** Document Review: 1. Iowa Correctional Institution for Women PAQ 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, dated, April 2016 Interviews: 1. PREA Compliance Manager The interview with the PREA Compliance Manager demonstrated any volunteer or contractor who engaged in sexual abuse would be removed from the facility and reported to law enforcement. Site Review Observation: During the last audit cycle, the facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies. (a) The Iowa Correctional Institution for Women PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with Inmates. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of Inmates.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, page 4, section 2. a., states, "Any contractor who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies."

(b) The Iowa Correctional Institution for Women PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with Inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, page 4, section 2. b., states, "IDOC shall take appropriate remedial measures, and shall consider whether to prohibit further contact with offenders, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor."

115.78 Disciplinary sanctions for inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, dated, April 2016
- 3. State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-RD-03, dated, December 2014

Interviews:

1. Facility Investigator

Interviews with the facility investigator demonstrated incarcerated individuals who falsely reported PREA allegations would typically be moved to another housing unit and disciplined per agency discipline procedures as outlined in the Incarcerated Individual Handbook.

(a) The lowa Correctional Institution for Women PAQ states inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guild for inmate-on-inmate sexual abuse. In the past 12 months there have been eight administrative findings of inmate-on-inmate sexual abuse have occurred at the facility. In the past 12 months there have no criminal findings of guilt for inmate-on-inmate sexual abuse, occurring at the facility.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, page 2, section Policy, states, "As described more fully in IDOC Policy IO-RD-01 Overview and Philosophy of Incarcerated Individual Discipline, it is the policy of the IDOC to use appropriate disciplinary action in the management of incarcerated individual violations of IDOC and institutional rules, regulations, policies, and procedures. Where the use of informal action or minor disciplinary report procedures are not appropriate or insufficient to achieve correctional goals, the major report process shall be used."

- (b) State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-RD-03, page 27, section I. 1., states, "Sanctions shall be explicit as to nature, extent, and duration, and are to be run consecutive with other sanction, unless otherwise noted by the ALJ."
- (c) State of lowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-RD-03, page 17, section D. 11., states, "If an incarcerated individual is in a special needs or mental health status at the time of the incident, the investigator must obtain a statement from a mental health professional as to the incarcerated individual's responsibility for the incarcerated individual's conduct as stated in the report."
- (d) The Iowa Correctional Institution for Women PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse.
- (e) The Iowa Correctional Institution for Women PAQ states the agency disciplines inmates for sexual contact with staff only upon finding that the staff member did not consent to such contact. ONLY

State of Iowa Department of Corrections Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-RD-03, page 48, section A., states, "Proposes a consensual sexual contact or sexual relationship with another person through gestures, such as, kissing, petting, etc., or by written or oral communications or engages in a consensual sexual contact or relationship. An incarcerated individual may be disciplined for proposing a consensual sexual contact or sexual relationship with staff only upon a finding that the staff member did not explicitly or implicitly consent to or encourage such a proposal."

f) The lowa Correctional Institution for Women PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, page 62, section 35., states, "False Statements - An incarcerated individual commits an offense under this subsection when the incarcerated individual knowingly makes a false statement whether or not under oath or affirmation including, but not limited to, dishonesty, deception, cheating, plagiarism, etc. A report of sexual harassment and/or sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying (or any other violation of this rule), even if an investigation does not establish evidence sufficient to substantiate the allegation."

(g) The Iowa Correctional Institution for Women PAQ states the agency prohibits all sexual activity between Inmates. If the agency prohibits all sexual activity between inmates and disciplines inmates for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

State of Iowa Department of Corrections Policy and Procedures, Chapter 1, Administration & Management, Policy AD-GA-13, page 6, second paragraph., states, "Class "A" if weapon used, victim exposed to potentially infectious bodily fluids, secretions, tissue, or excrement, or the victim suffers a mental or physical injury; Class "B" for all other violations.

State of Iowa Department of Corrections Iowa Correctional Institution for Women, Policy and Procedures, Chapter 3, Institutional Operations, Policy IO-RD-03, page 40, section 15. A., states "Proposes a consensual sexual contact or sexual relationship with another person through gestures, such as, kissing, petting, etc., or by written or oral communications or engages in a consensual sexual contact or relationship. An offender may be disciplined for proposing a consensual sexual contact or sexual relationship with staff only upon a finding that the staff member did not explicitly or implicitly consent to or encourage such a proposal."

115.81 Medical and mental health screenings; history of sexual abuse

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, dated, June 2021
- 3. State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, dated, May 2021
- 4. Secondary Listing of Inmate Disclosures
- 5. State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, dated, September 2021
- 6. Department of Corrections Medical and Mental Health Services Sexual Victimization Reporting Consent Form, dated September 2021

Interviews:

- 1. Targeted incarcerated individuals
- 2. Correctional Counselors
- 3. Intake Sergeant
- 4. Psychologist

Interviews with staff and incarcerated individuals demonstrated disclosure reports are reported to the Mental Health staff. Documentation of disclosures and follow up appointments are documented in the agency database.

Site Review Observation:

A review of incarcerated files demonstrated disclosures for either victimization and or perpetration is documented and follow up medical and or mental health appointments are offered and documented.

(a, c) The Iowa Correctional Institution for Women PAQ states all Inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months 100% of inmates who disclosed prior victimization during the intake screening. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 4, section c. 1., "If the paper SVP Intake Screening Tool, or the Sexual Violence Propensity (SVP) assessment in ICON indicates that the incarcerated individual has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure the incarcerated individual is offered a follow-up meeting with a medical and mental health practitioner within 14 days of the SVP."

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 4, section c. 1., "If the paper SVP Intake Screening Tool, or the Sexual Violence Propensity (SVP) assessment in ICON indicates that the incarcerated individual has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure the incarcerated individual is offered a follow-up meeting with a medical and mental health practitioner within 14 days of the SVP."

The facility provided a Secondary Listing of Inmate Disclosure listing. This listing includes the date of disclosure, inmate name and number, victim, request services, perpetrator.

(b) The Iowa Correctional Institution for Women PAQ states all Inmates who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.341, are offered a follow-up meeting with a mental health practitioner. All Inmates are allowed a follow-up meeting offered within 14 days of the intake screening. In the past 12 months 100% of inmates who disclosed previously perpetrated sexual abuse, as indicated during the screening process.

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-01, page 4, section c. 2., "If the paper SVP Intake Screening Tool, or the Sexual Violence Propensity (SVP) assessment in ICON indicates that, an incarcerated individual has previously perpetrated sexual violence, whether it occurred in an institutional setting or in the community, staff shall ensure the incarcerated individual is offered a follow-up meeting with a mental health practitioner within 14 days of the SVP."

State of Iowa Department of Corrections Policy and Procedures, Chapter 4, Institutional Services, Policy IS-RO-02, page 4, section c. 2., "If the paper SVP Intake Screening Tool, or the Sexual Violence Propensity (SVP) assessment in ICON indicates that, an incarcerated individual has previously perpetrated sexual violence, whether it occurred in an institutional

setting or in the community, staff shall ensure the incarcerated individual is offered a follow-up meeting with a mental health practitioner within 14 days of the SVP."

(d) The Iowa Correctional Institution for Women PAQ states, Information related to sexual victimization or abusiveness that occurred in an institutional setting is not strictly limited to medical and mental health practitioners.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 6, section C. 1., states, "Any information related to sexual violence that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform of treatment plans and security and management decisions, including housing, bed, work, education and program assignments, or as otherwise required by Federal, State or local law."

(e) The Iowa Correctional Institution for Women PAQ states, Medical and mental health practitioners do obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institution setting unless the inmate is under the age of 18.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 6, section C. 2., states, "Medical and mental health practitioners shall obtain informed consent from incarcerated individual before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the incarcerated individual is under the age of 18. (PREA 115.81 (e)) Electronic consent is recorded in Medical ICON."

The facility provided a Department of Corrections Medical and Mental Health Services Sexual Victimization Reporting Consent Form. The Consent form states and documents, the following: Pursuant to PREA standard 115.81€ Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimizations that did NOT occur in an institutional setting, unless the inmate is under the age of 18. I, ____ No.____, hereby voluntarily give consent to the reporting and disclosure of previous incidences of sexual assault, abuse or harassment that occurred outside an institutional or correctional setting." The form is signed and dated by the 'patient'.

115.82 Access to emergency medical and mental health services

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, dated, September 2021

Interviews:

- 1. Targeted incarcerated individuals
- 2. Correctional Counselors
- 3. Mental Health Staff

Interviews with staff and incarcerated individuals demonstrated that each are aware of access to emergency medical and mental health services and such services have been offered and accepted.

(a-b) The lowa Correctional Institution for Women PAQ states inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 1-2, section Policy, states, "It is the policy of the Iowa Department of Corrections that patients who report sexual abuse while incarcerated shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services; be offered psychological (mental health) and medical services; and, when appropriate, a forensic examination or sexual abuse examination will be completed by a qualified professional. Treatment services shall be consistent with the community level of care and provided without financial cost regardless of whether the victim names the aggressor or cooperates with any investigation arising out of the incident."

Page 5, section h., states, "The Shift Supervisor shall attempt to make available to the patient a victim advocate from a community crime victim center. If a community crime victim center is not available to provide victim advocate services, the Shift Supervisor shall make these services available through a qualified staff member from a community- based organization, or a qualified IDOC staff member. The Shift Supervisor shall document such efforts."

(c) The lowa Correctional Institution for Women PAQ states Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 5, section f., states, "Offer patients of sexual abuse timely information and access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care where medically appropriate."

(d) The Iowa Correctional Institution for Women PAQ states Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Policy compliance can be found in provision (a) of this standard.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 5, section g., states, "Offer patients of sexually abusive vaginal penetration pregnancy tests if appropriate. If pregnancy results from the sexual abuse, patients shall receive timely and comprehensive information and timely access to all lawful pregnancy-related medical services."

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

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, dated, September 2021

Interviews:

- 1. Targeted incarcerated individuals
- 2. Correctional Counselors
- 3. Mental Health Staff

Interviews with staff and incarcerated individuals demonstrated that each interviewed are aware of access to emergency medical and mental health services. Incarcerated individuals who reported sexual abuse reported staff acted immediately, empathetically and addressed their concerns and needs.

(a, c) The Iowa Correctional Institution for Women PAQ states the facility offers 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.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 1-2, section Policy, states, "It is the policy of the Iowa Department of Corrections that patients who report sexual abuse while incarcerated shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services; be offered psychological (mental health) and medical services; and, when appropriate, a forensic examination or sexual abuse examination will be completed by a qualified professional. Treatment services shall be consistent with the community level of care and provided without financial cost regardless of whether the victim names the aggressor or cooperates with any investigation arising out of the incident."

- (c) State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 11, section 2., states, "The evaluation and treatment of victims of sexual violence in any prison, jail, lockup, or juvenile facility shall 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."
- (d-e) State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 11, section g., states, "Offer patients of sexually abusive vaginal penetration pregnancy tests if appropriate. If pregnancy results from the sexual abuse, patients shall receive timely and comprehensive information and timely access to all lawful pregnancy-related medical services."
- (f) The Iowa Correctional Institution for Women PAQ states Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 8, section 3., states, "Encourage follow-up STI exams, testing, immunizations, counseling, and treatment as directed. Although patients may be reluctant to go for follow-up exams for STIs, such exams are essential because they provide an opportunity to detect new infections acquired during or after the abuse."

- (g) The Iowa Correctional Institution for Women PAQ states treatment services are 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. Policy compliance can be found in provision (a) of this standard.
- (h) State of Iowa Department of Corrections Policy and Procedures, Chapter 6, Health Services, Policy HSP-628, page 6, section B. 2., states," All institutions shall attempt to conduct a mental health evaluation of all known patient-on-patient aggressors within 60 days of learning of such sexual violence history and offer treatment when deemed appropriate by mental health practitioners."

115.86 Sexual abuse incident reviews

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, dated, September 2021
- 3. DOC Investigation Sexual Abuse Incident Review

Interviews:

1. PREA Compliance Manager

The team on-site were aware of the requirements to document and safeguard investigations. Incident reviews are completed by the facility multi-disciplinary team.

(a) The lowa Correctional Institution for Women PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been 11 administrative investigations of alleged sexual abuse completed at the facility,

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 22, section K. 1, states, "The institution, in association with the PREA Coordinator, shall conduct a sexual violence incident review at the conclusion of every sexual violence investigation that results in a substantiated or unsubstantiated finding."

The facility provided a completed DOC Investigation – Sexual Abuse Incident Review. For confidentiality purposes, the components of the form will be explained in this report without personal identifiers. The Sexual Abuse Incident Review form includes the following components.

- 1. Date of Initial Meeting
- 2. Review Closure Date
- 3. Review Team Members
- 4. Date Report / Recommendations to Warder, Deputy, PC, PCM
- 5. DIS Case Number
- 6. Findings
- 7. Perpetrator(s)
- 8. Victim(s)
- 9. Narrative of Case
- 10. Examine area of institution where contact occurred/For each area identify:
- 11. Was the incident or allegation motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, Intersex Identification, status or perceived, gang affiliation, motivated/caused by other group dynamics
- 12. Things that went well
- 13. Changes needed in policy or practice to better prevent, detect, or respond to sexual violence or retaliation
- (b) The Iowa Correctional Institution for Women PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation.

In the past 12 months, the number of 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 was 11.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 22, section K. 2, states, "Such review shall ordinarily occur within 30 days of the conclusion of the investigation."

(c) The Iowa Correctional Institution for Women PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 22, section K. 3. a-g, states, "The review team shall include:

- a. Warden or designee;
- b. Unit managers or other upper-level management team members responsible for the areas of the institution where the incident occurred;
- c. Shift supervisors involved with the case or the shift on which the misconduct occurred;
- d. At least one of the sexual violence investigators on the case;

- e. Medical or mental health practitioners when involved with the perpetrator or the victim;
- f. Institution's PREA Compliance Manager/PREA Coordinator;
- g. PREA Coordinator in substantiated cases of staff sexual misconduct or incarcerated individual sexual abuse."
- (d) The Iowa Correctional Institution for Women PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA compliance manager.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 22-23, section K. 4. a-f., states, "The review team shall:

- b. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or
- c. Consider whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status, gang affiliation, or was motivated or otherwise caused by other group dynamics at the institution;
- d. Examine the areas where the incident occurred to assess whether physical barriers in the area may enable abuse;
- e. Assess the adequacy of staffing levels in that area during different shifts;
- f. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- g. Prepare a report of its findings using PREA-02 F-5, Sexual Abuse Incident Review Report, and by entry of Form 5 into the PREA Investigation Database. The report shall include but not necessarily be limited to determinations made pursuant the above, and any recommendations for improvement. The report shall be distributed to the Warden, Deputy Director of Institution Operations, and the institution's PREA Compliance Manager/PREA Coordinator."
- (e) The Iowa Correctional Institution for Women PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so. Compliance can be found in provision (d) of this standard.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-02, page 23, section K. 5., states, "The institution shall implement the recommendations for improvement, or shall document its reasons for not doing so."

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Iowa Correctional Institution for Women PAQ 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, dated, August 2021 3. SSV-2 Survey of Sexual Victimization, 2020 4. SSV-IA, Survey of Sexual Victimization, 2020
	(a)/(c)-1,2 The lowa Correctional Institution for Women PAQ states 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. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.
	State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, page 3, section 5., states, "The PREA Coordinator shall provide all such data from the previous calendar year to the Department of Justice no later than June 30 each year."
	(b) The Iowa Correctional Institution for Women PAQ states the annual report includes a comparison of the current year's data and corrective action from prior years.
	(d) The Iowa Correctional Institution for Women PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
	(e) The Iowa Correctional Institution for Women PAQ states N/A as the agency does not contract with private facilities, therefore this provision is not applicable to the agency.
	(f) The Iowa Correctional Institution for Women PAQ states the Department of Justice has requested agency data for the previous calendar year.
	The facility provided a completed Department of Justice Survey of Sexual Victimization and a State of Iowa Survey of Sexual Victimization.
	Through such reviews, the facility meets the standard requirements

115.88 Data review for corrective action Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Iowa Correctional Institution for Women PAQ
- 2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, dated, August 2021
- 3. Iowa Department of Corrections, PREA Annual Report, July 2021
- (a) The Iowa Correctional Institution for Women PAQ states the agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including:
- Identifying problem areas;
- · Taking corrective action on an ongoing basis; and
- Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, page 3, section B. 4., states, "Specific material from the reports may be redacted when publications would present a clear and specific threat to the safety and security of an institution, but IDOC shall indicate the nature of the material redacted."

(b) The Iowa Correctional Institution for Women PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

The agency provided the Iowa Department of Corrections, PREA Annual Report, July 2021. The annual report includes the following components.

- PREA Background
- Annual Reports to DOJ / BJS 3 Governor's Certification
- Data Comparison for 2020 and Prior Years
- Trend Analysis for all Prisons
- Trend Analysis by Prison
- Trend Analysis Prison Populations and Investigations
- Offender on Offender Allegation Sexual Assault
- Offender on Offender Allegations Sexual Abuse
- Offender on Offender Allegations Precursor Behavior
- Staff, Contractor, or Volunteer on Offender Allegations Sexual Misconduct
- Staff, Contractor, or Volunteer on Offender Allegations Sexual Harassment
- Both Staff and Offender Allegations Retaliation
- PREA Investigation Findings and CBC PREA Stats
- Summary of year 2020 Goal completion
- Data Assessment
- (c) The Iowa Correctional Institution for Women PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The following is the agency website where the annual reports for the last seven years are located is Annual PREA Reports | Iowa Department of Corrections. Annual reports from 2014 through 2021 are posted on the agency website.
- (d) The lowa Correctional Institution for Women PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. Policy compliance can be found in provision (a) of this standard.

115.89	Data storage, publication, and destruction		
	Auditor Overall Determination: Meets Standard		
	Auditor Discussion		
	Document Review:		
	1. Iowa Correctional Institution for Women PAQ		
	2. State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, dated, August 2021		
	(a) The Iowa Correctional Institution for Women PAQ states the agency ensures that incident-based and aggregate data are securely retained.		
	State of Iowa Department of Corrections Policy and Procedures, Chapter 11, Prison Rape Elimination Act, (PREA), Policy PREA-04, page 3-4, section C. 1-4, state, "Data Storage, Publication, and Destruction 1. IDOC shall ensure that data collected is securely retained.		
	2. IDOC shall make all aggregated sexual abuse data readily available to the public at least annually on the IDOC website and posted on the State Library. IDOC shall make sexual abuse data available to the Department of Administration (DAS) Attorney.		
	 Before making aggregated sexual abuse data publicly available, IDOC shall remove all personal identifiers. Sexual abuse data shall be retained for at least 10 years after the date of the initial collection or for as long as the subject of the investigation is an employee of the State of Iowa." 		
	(b) The lowa Correctional Institution for Women PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. Policy compliance can be found in provision (a) of this standard.		
	(c) The Iowa Correctional Institution for Women PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. Policy compliance can be found in provision (a) of this standard.		
	Through such reviews, the facility meets the standard requirements		

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once.
	(b) This is the third audit cycle for Iowa Correctional Institution for Women and the third year of the third audit cycle.
	(h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility.
	(i) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).
	(m) The Auditor was permitted to conduct private interviews with residents.
	(n) Residents permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.
	Through such reviews, the facility meets the standard requirements.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(b) The agency has posted the current 2019 PREA audit report, on their website.
	Through such reviews, the facility meets the standard requirements.

Appendix: Provision Findings		
115.11 (a)	22 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

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

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

115.16 (a)	15.16 (a) Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication 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)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who 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
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes

115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	no
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes

115.31 (c)	Employee training		
	Have all current employees who may have contact with inmates received such training?	yes	
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes	
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes	
115.31 (d)	Employee training		
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes	
115.32 (a)	Volunteer and contractor training		
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes	
115.32 (b)	Volunteer and contractor training		
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes	
115.32 (c)	Volunteer and contractor training		
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes	
115.33 (a)	Inmate education		
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes	
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes	
115.33 (b)	Inmate education		
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes	
115.33 (c)	Inmate education		
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes	
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes	

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

115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or 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
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	no
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d) (8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent degree, 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 degree, 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 degree, legal settlement, or legal judgement.)	yes
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
	violation of responsibilities that may have contributed to such incidents?	

115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain 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
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	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.)	na
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
	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.)	na

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	na
	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.)	na
	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.)	na
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	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.).	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na

115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes

115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of 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
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations 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

115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (I)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

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 unlounded? Its 73 (b) Reporting to inmates If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) In 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 are considered in the agency distinct and criminal resident with a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident numbers are agreed at the facility? Following an inmate's allegation that a staff member has committed sexual abuse against 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? 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 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 against the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the allegation is unfounded, or unless the resident has been released from custody, does the ag	115.72 (a)	Evidentiary standard for administrative investigations	
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? 115.73 (b) Reporting to inmates If the agency did not conduct the investigation into an immate'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? (NA if the agencyifacility is responsible for conducting administrative and criminal investigations.) 115.73 (c) Reporting to inmates Following an immate'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 immate has been released from custody, does the agency subsequently inform the resident whenever. The staff member is no longer possed within the immate's uniform the resident whenever. The staff member is no longer employed at the facility? Following an immate's allegation that a staff member has committed sexual abuse against 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? Following an immate'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 whenever. The agency learns that the staff member has committed sexual abuse against the resident whenever. The agency learns that the 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 resident unless the agency autosequently inform the allegation is unfounded. Following an immate's allegation that he or she ha		evidence in determining whether allegations of sexual abuse or sexual harassment are	yes
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			yes
Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	115.76 (b)	Disciplinary sanctions for staff	
		Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

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

115.78 (f)	Disciplinary sanctions for inmates		
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes	
115.78 (g)	Disciplinary sanctions for inmates		
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes	
115.81 (a)	Medical and mental health screenings; history of sexual abuse		
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes	
115.81 (b)	Medical and mental health screenings; history of sexual abuse	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes	
115.81 (c)	Medical and mental health screenings; history of sexual abuse		
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes	
115.81 (d)	Medical and mental health screenings; history of sexual abuse		
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes	
115.81 (e)	Medical and mental health screenings; history of sexual abuse		
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes	
115.82 (a)	Access to emergency medical and mental health services		
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes	
115.82 (b)	Access to emergency medical and mental health services		
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes	
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes	

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

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

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

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