

Prison Rape Elimination Act (PREA) Audit Report Adult Prisons & Jails

Interim Final

Date of Report March 23, 2019

Auditor Information

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| Name: William Willingham | Email: william.willingham@nakamotogroup.com |
| Company Name: The Nakamoto Group, Inc. | |
| Mailing Address: 11820 Parklawn Drive, Suite 240 | City, State, Zip: Rockville, MD 20852 |
| Telephone: 301-468-6535 | Date of Facility Visit March 5-7, 2019 |

Agency Information

| | | | |
|--|-----------------------------------|--|---|
| Name of Agency: Iowa Department of Corrections | | Governing Authority or Parent Agency (If Applicable): Governor Kim Reynolds | |
| Physical Address: 510 East 12th Street | | City, State, Zip: Des Moines, IA 50319 | |
| Mailing Address: Same as Above | | City, State, Zip: Same as Above | |
| Telephone: 515-725-5071 | | Is Agency accredited by any organization? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| The Agency Is: | <input type="checkbox"/> Military | <input type="checkbox"/> Private for Profit | <input type="checkbox"/> Private not for Profit |
| <input type="checkbox"/> Municipal | <input type="checkbox"/> County | <input checked="" type="checkbox"/> State | <input type="checkbox"/> Federal |
| Agency mission: To Create Opportunities for Safer Communities | | | |
| Agency Website with PREA Information: https://doc.iowa.gov/administration/prison-rape-elimination-act | | | |

Agency Chief Executive Officer

| | |
|-------------------------------------|------------------------------------|
| Name: Dan Craig | Title: Acting IDOC Director |
| Email: daniel.craig@iowa.com | Telephone: 515-725-5708 |

Agency-Wide PREA Coordinator

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|------------------------------------|--------------------------------|
| Name: Robin Bagby | Title: PREA Coordinator |
| Email: robin.bagby@iowa.com | Telephone: 515-725-5708 |

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| PREA Coordinator Reports to: Inspector General | Number of Compliance Managers who report to the PREA Coordinator 0 |
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Facility Information

Name of Facility: Iowa Correctional Institution for Women (ICIW)

Physical Address: 420 Mill St. SW, Mitchellville, IA 50169

Mailing Address (if different than above):

Telephone Number: 515-725-5042

The Facility Is: Military Private for profit Private not for profit

Municipal County State Federal

Facility Type: Jail Prison

Facility Mission: To create an environment that reflects an understanding of the realities of women’s lives and empower them to make positive change and return to the community as healthier productive citizens.

Facility Website with PREA Information: <https://doc.iowa.gov/administration/prea/annual-prea-reports>

Warden/Superintendent

Name: Sheryl Dahm **Title:** Warden

Email: Sheryl.Dahm@iowa.gov **Telephone:** 515-725-5007

Facility PREA Compliance Manager

Name: David Southwick **Title:** Captain

Email: David.Southwick@iowa.gov **Telephone:** 515-725-5038

Facility Health Service Administrator

Name: Kerri Freidhoff **Title:** Nursing Services Director

Email: Kerri.Freidhoff@iowa.gov **Telephone:** 515-725-5235

Facility Characteristics

Designated Facility Capacity: 888 **Current Population of Facility:** 732

Number of inmates admitted to facility during the past 12 months 1450

Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more: 1028

Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more: 1364

| | | | |
|---|--------------------------------|--|--|
| Number of inmates on date of audit who were admitted to facility prior to August 20, 2012: | | | 66 |
| Age Range of Population: | Youthful Inmates Under 18: N/A | Adults: 19-65 | |
| Are youthful inmates housed separately from the adult population? | | <input type="checkbox"/> Yes | <input type="checkbox"/> No <input checked="" type="checkbox"/> NA |
| Number of youthful inmates housed at this facility during the past 12 months: | | | none |
| Average length of stay or time under supervision: | | | 4.9 months |
| Facility security level/inmate custody levels: | | | Security Levels only-Minimum Live Out, Minimum, Medium and Maximum |
| Number of staff currently employed by the facility who may have contact with inmates: | | | 203 |
| Number of staff hired by the facility during the past 12 months who may have contact with inmates: | | | 47 |
| Number of contracts in the past 12 months for services with contractors who may have contact with inmates: | | | 8 |
| Physical Plant | | | |
| Number of Buildings: 18 | | Number of Single Cell Housing Units: 2 | |
| Number of Multiple Occupancy Cell Housing Units: | | 13 | |
| Number of Open Bay/Dorm Housing Units: | | 5 | |
| Number of Segregation Cells (Administrative and Disciplinary): | | 38 | |
| Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room is, retention of video, etc.): There are cameras located strategically throughout the facility. Cameras are monitored from a central control room which also controls doors and gates and has an alarm function that activates when a door or gate is opened. The control center is staffed at all times. Videos may be retained at least 30 days. | | | |
| Medical | | | |
| Type of Medical Facility: | | Skilled Nursing | |
| Forensic sexual assault medical exams are conducted at: | | Mercy Hospital in Des Moines, IA | |
| Other | | | |
| Number of volunteers and individual contractors, who may have contact with inmates, currently authorized to enter the facility: | | | 366 |
| Number of investigators the agency currently employs to investigate allegations of sexual abuse: | | | 7 |

Audit Findings

Audit Narrative

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

PRE-AUDIT PREPARATION

Prior to the on-site visit, representatives from the Inspector General's office conducted an on-site "pre-audit" of the facility to ensure PREA audit compliance. These staff members are extremely knowledgeable of the PREA, are PREA Managers and some are certified auditors. The state PREA Coordinator had the facility forward all policy and supporting documentation to the auditor, including the completed Pre-Audit Questionnaire, for examination prior to the on-site visit. The policy and supporting documentation were in the form of state directives, local policy and other forms/memos, etc. The results of the "pre-audit" were discussed with the auditor by the PREA Coordinator and institution PREA Compliance Manager, prior to the beginning of the on-site audit.

ENTRANCE BRIEFING AND TOUR (ON-SITE AUDIT)

The on-site PREA (Prison Rape Elimination Act) audit of the Iowa Correctional Institution for Women, Mitchellville, IA, was conducted March 5-7, 2019. The audit was completed by The Nakamoto Group, Inc. certified auditor William Willingham. This is the second PREA audit for this facility. An entrance meeting was held the first day of the audit to discuss any concerns regarding the audit process and to finalize the facility tour and interview schedules. The following persons were in attendance: The Warden, the Deputy Warden, several Associate Wardens, the PREA Compliance Manager (PCM), the Administrative Captain (Chief of Security) and several facility department heads/support staff. After the meeting, a comprehensive tour of the facility was completed. The ICIW is a female-only facility. The tour included the intake processing area, all housing units, including the Special Housing Unit (SHU), the Health Services Department, Recreation, Food Service, facility support areas, Education, the Visiting Room, outside storage areas and programming areas. The auditor observed the facility configuration, location of cameras, staff supervision of offenders, housing configurations (including shower/toilet areas), security monitoring, offender entrance and search procedures and offender program participation. During the tour, it was noted that there was sufficient staffing, security mirrors, observation areas and surveillance cameras to ensure a safe environment for offenders and staff. Signs were posted (in English and Spanish) that indicated employees of the opposite gender were present in the housing units. Offenders were

able to shower, dress and use the toilet facilities without exposing themselves to employees of the opposite gender. Informal and formal conversations with employees and offenders regarding the PREA standards were conducted. Postings regarding the reporting of PREA violations and the agency's zero tolerance policy for sexual abuse and sexual harassment were prominently displayed in all housing units, meeting areas and throughout the facility. Audit notice postings with the PREA auditors' contact information were also located in the same areas. These notices were posted on January 18, 2019. There were no letters mailed to the auditor as a result of the audit postings in the housing units. During the audit, one offender requested and was granted a private interview with the auditor.

STAFF-OFFENDER INTERVIEWS

A total of twenty randomly selected correctional staff members were interviewed. Correctional Officers, Sergeants and Captains from all shifts were included in the interview process. Unit staff members (Counselors and Unit Managers) were also interviewed. All were aware of the agency's zero tolerance policy and of their responsibilities to protect offenders from sexual abuse/sexual harassment. Additionally, they could explain their understanding of new employee and annual PREA training and their first responder duties as part of a coordinated response. The agency Director, agency PREA Coordinator and agency Contract Administrator had been previously interviewed (the auditor is in receipt of the completed interview questionnaires). All specialized staff were also interviewed, to include the Warden, the PCM, Mental Health staff, two Investigators, the Human Resource Manager, Intake staff, the SHU Supervisor and the Nursing Supervisor. Two contractors, five volunteers, a Sexual Abuse Nurse Examiner (SANE) Supervisor from a local hospital and one community victim advocate were also interviewed. All interviewed staff, contractors and volunteers demonstrated an understanding of the PREA and their responsibilities under this program, relative to their position in or with the organization and employment status. No staff, contractors or volunteers refused to be interviewed.

A total of thirty-five offenders were selected to be interviewed. The interviewed offenders were of various ages, nationalities and ethnic backgrounds. The interviews (targeted offenders) included only three offenders who self-identified as being transgender, only four offenders who reported being previous victims of sexual abuse (at intake), three offenders who self-identified as being gay and two offenders who self-identified as being bisexual. No offenders self-identified as being intersex. One Limited English Proficient (LEP) and three disabled offenders (one with cognitive disabilities and two with physical disabilities) were also included in the group interviewed. No offenders interviewed claimed prior sexual aggression during the intake screening process and none requested therapy. The rest of the interviewed offenders were randomly selected. There were no offenders in Protective Custody (in the SHU) for any PREA related issue; the facility does not place alleged victims or those considered high risk in the SHU. One offender requested and was granted an interview with the auditor. Overall, all offenders interviewed demonstrated a good understanding of the PREA compliance program, the intake screening process, the prevention and protection process and the reporting mechanisms (all education requirements under the PREA were met). The offenders further stated that staff members were responsive to their needs and that they clearly felt safe at the facility. No offenders refused to be interviewed.

INVESTIGATIONS

On the first day of the audit, a review of the investigations opened and completed, during the past 12 months, alleging sexual abuse or sexual harassment, was conducted. During the audit period, there were a total of twenty-six allegations of sexual abuse. The allegations reported by offenders involved offender-on-offender and staff-on-offender sexual abuse/sexual harassment. None of the cases required forensic evidence collection by a SANE service provider in the community. Twelve investigations were determined to be unsubstantiated, three were substantiated and eleven were unfounded. All investigations were completed promptly and thoroughly and were well documented.

Facility Characteristics

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

The facility that was the basis of the current ICIW was originally established in 1873. Since that time, the institution has undergone expansions, mission changes, renovations, moved to different locations and had name changes. In 1981, the State of Iowa closed the Women's Reformatory in Rockwell City due to the need for additional space for male offenders. The girls at the Iowa Industrial School for Girls at Mitchellville were transferred to the Iowa Juvenile home in Toledo. In July 1982, the women were transferred from Rockwell City to Mitchellville. The ICIW was expanded in 2014 to its current configuration. Only females had been assigned to the ICIW in previous years. The ICIW currently has a total of twenty general population housing units with a mix of secured cells, open dormitories and a Special Housing Unit (SHU-protective custody-only single and double occupancy cells). The SHU segregates offenders from the general population for various reasons. One of the units is outside of the secure perimeter and serves as a transition program prior to release. The facility currently only houses adults and does not house males or youthful offenders. At the time of the audit, the total population was 732. The ICIW offers numerous social development courses, HiSet (GED) test preparation and testing, literacy-based education programs, a drug treatment program and other training/counseling programs. ICIW offender work assignments include dietary (kitchen), facility maintenance, janitors (orderlies), landscape maintenance, various clerical duties and other facility support assignments. The facility has an Iowa Prison Industry program that includes on-the-job training and the development of work skills. Recreational programs include team and individual sports activities, hobby craft, wellness instruction and TV viewing. The ICIW recreation area/yards are very large. The facility also provides a number of religious programs involving numerous faith groups. Additionally, court-mandated legal resource materials for offenders, with electronic data and reference books, are provided.

Summary of Audit Findings

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, **along with a list of each of the standards in each category**. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

EXIT BRIEFING AND FINDINGS

When the on-site audit was completed, another meeting was held with the Warden, Iowa Inspector General, PREA Coordinator and other staff to discuss the audit findings. The IDOC Director and several of his staff overheard the results of the audit through a conference call. The facility was found to be fully compliant to the PREA. Two standards were determined to be not-applicable (Youthful Offenders and Grievances). The auditor had been provided with and examined extensive files, policy and supporting documentation prior to and during the audit to support a conclusion of compliance with the PREA. All interviews and observations also supported compliance. The facility personnel were found to be cooperative and professional. Staff morale appeared to be very good and the observed staff/offender relationships were determined to be excellent. All areas of the facility were observed to be clean and well maintained. At the conclusion of the audit, the auditor thanked the Warden and staff for their hard work and dedication to the PREA audit process.

Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

Number of Standards Exceeded: 0

Number of Standards Met: 45

Number of Standards Not Met: 0

Summary of Corrective Action (if any) none

PREVENTION PLANNING

Standard 115.11: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by The Auditor to Complete the Report

115.11 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? Yes No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? Yes No

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? Yes No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? Yes No
- 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 No

115.11 (c)

- 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 No NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies Offender PREA Information (PREA-01), Staff, Contractor, or Volunteer Sexual Misconduct/Harassment/Retaliation with Offenders (PREA-02), Staff Response to Offender on

Offender Sexual Violence or Retaliation (PREA-03), PREA Data Collection, Reporting, and Audit Compliance (PREA-04) and Major Discipline Report Procedures (IO-RD-03) were reviewed and address the requirements of this standard. These policies outline a zero-tolerance policy for all forms of sexual abuse and sexual harassment and the agency and facility's approach to preventing, detecting and responding to sexual abuse and harassment. The IDOC has appointed an agency-wide PREA Coordinator assigned to the Inspector General's (IG) Office. The PREA Coordinator has sufficient time and authority to serve as the department-wide coordinator to develop, implement and oversee agency efforts to comply with the PREA standards in all IDOC institutions. Although the department-wide PREA Coordinator does not directly supervise the facility PREA Compliance Manager (PCM), there is communication by phone or an email distribution system to respond to inquiries and to work through PREA related concerns at the facility level. The PREA Coordinator meets quarterly with the PCMs to discuss PREA related concerns as it impacts operations. This is a time for the PCMs to consult with one another, seek clarification and to learn. At the ICIW, the Warden has appointed a Captain as the PCM. The PCM reports directly to the Warden regarding all PREA related concerns. Interviews with the agency PREA Coordinator and PCM confirmed that each has sufficient time and authority to coordinate efforts to comply with PREA standards. Offenders are informed verbally about the zero-tolerance policy and the PREA program during in-processing procedures, by viewing a video and during additional admission and orientation presentations. The video is offered in English and in Spanish. Offenders are also informed about the PREA program and zero-tolerance in the Offender Information Guide and Staying Safe-A Guide for Offender Conduct. The auditor observed PREA information postings throughout the facility. All written documents are available in English and Spanish. Additional interpretive services are available for offenders who do not speak or read English. All employees, contractors and volunteers attend new employee training which includes PREA training and all are provided PREA refresher training annually. Employees carry an embossed PREA reference card, which outlines PREA policy. All interviews with staff, volunteers, contractors and offenders confirmed that each was aware of the zero-tolerance policy towards all forms of sexual abuse/sexual harassment. Based on the review of established policies, procedures, the inmate handbook, the education and orientation process, training curriculums, interviews with staff and offenders and observation of bulletin boards, posters and PREA material during the tour of the facility, it was concluded that the ICIW is committed to zero tolerance of sexual abuse and sexual harassment and meets the requirements of this standard.

Standard 115.12: Contracting with other entities for the confinement of inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.12 (a)

- If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on

or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) Yes No NA

115.12 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC polices Agreements & Contracts (AD-GA-13), Interstate Corrections Compact Transfer for Prison (IS-CL-09) and the Purchase of Service Agreements with eight Judicial Districts, Department of Correctional Services, were reviewed by the auditor. The agency meets the requirements of this standard. A review of the documentation submitted confirmed the agency requires other entities contracted with for the confinement of inmates to adopt and comply with the PREA standards. The ICIW does not individually contract for the confinement of offenders.

Standard 115.13: Supervision and monitoring

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.13 (a)

- Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No
- Does the agency ensure that each facility has documented a staffing plan that provides for

adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No

- Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? Yes No NA
- Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring? Yes No

115.13 (b)

- In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)
 Yes No NA

115.13 (c)

- 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 No
- 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 No
- 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 No

115.13 (d)

- 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 No
- Is this policy and practice implemented for night shifts as well as day shifts? Yes No
- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies Review of Staffing Requirements (AD-PR-03), Management of the Security Program (IO-SC-01), Leadership Team Meeting Minutes, Housing Rounds History Report and the Staffing Plan were reviewed and address the requirements of this standard. Compliance with the PREA and other safety and security issues are always a primary focus when the administration considers and reviews their staffing plan. The plan is reviewed at least annually in consultation with the PCM. The facility documents and justifies all deviations from the plan as reviewed and the reasons that the staffing plan was not met. Deviations from the Staffing Plan are documented in reports and include staff call-ins (sick leave or other absences), unscheduled trips and construction escorts. The facility has a PDA scanning system, with scan points throughout the institution, to ensure security rounds are being completed in those areas identified as needing additional observation and documentation is provided of the rounds being performed. The ICIW has the policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter sexual abuse and sexual harassment. Such policy and practice has been implemented for all shifts. The facility has a policy which prohibits staff from alerting other staff members that these supervisory rounds are occurring. Documentation of rounds was reviewed by the auditor. Based on a review of policy, procedures, staffing plans and logs, as well as interviews with the Warden, PCM, intermediate-level and higher-level supervisors and observations while touring the facility, the ICIW is compliant with this standard.

Standard 115.14: Youthful inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.14 (a)

- 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 No NA

115.14 (b)

- In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA
- In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

115.14 (c)

- 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 No NA

- Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA
- Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The ICIW does not house youthful offenders.

Standard 115.15: Limits to cross-gender viewing and searches

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.15 (a)

- 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 No

115.15 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20, 2017.) Yes No NA
- 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 here for facilities with less than 50 inmates before August 20, 2017.) Yes No NA

115.15 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? Yes No
- Does the facility document all cross-gender pat-down searches of female inmates? Yes No

115.15 (d)

- Does the facility implement a policy and practice 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 No
- Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? Yes No

115.15 (e)

- 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 No
- 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 No

115.15 (f)

- 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 No
- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (Requires Corrective Action)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies Cross Gender Supervision (IO-SC-17), Searches (IO-SC-18), staff training records and Management of Gender Dysphoria (HSP-704) were reviewed and address the requirements of this standard. Cross-gender strip and body cavity searches are prohibited. There were no cross-gender visual body cavity or strip searches conducted in the facility during the audit period. Strip searches are completed by staff of the same gender as the offender. Interviews with correctional officers and offenders indicate that offenders are allowed to shower, dress and use the toilet privately without being viewed by staff of the opposite gender (observed by the auditor during the tour). Offenders and staff reported that staff members of the opposite gender utilize a bell notification system to indicate their presence. Staff members were aware of the policy prohibiting the search of transgender or intersex offenders to determine their genital status. The ICIW only houses adult female offenders. All correctional officers receive annual training on pat down and strip searches, including cross gender pat down searches and searches of transgender and intersex offenders. Based on policies, procedures, documentation provided, observations of showers, toilet areas and dressing areas, as well as interviews with staff and offenders (including three transgender offenders), the ICIW has been determined to be compliant with this standard.

Standard 115.16: Inmates with disabilities and inmates who are limited English proficient

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.16 (a)

- 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 No
- 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 No
- 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 No

- 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 No
- 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 No
- 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 No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? Yes No
- 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 No
- 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 No
- 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 No
- 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 No

115.16 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? Yes No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No

115.16 (c)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies Offender Admission Procedures (IS-RO-01), ICIW IO-RO-01 and CTS Language Services (ICIW IO-RO-02) were reviewed and address the requirements of this standard. Through policy and practice, the facility ensures that offenders with disabilities and with Limited English Proficiency (LEP) have an equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment. The three disabled and one LEP offenders interviewed stated they were instructed about PREA information, were able to understand the instructions and felt safe from sexual abuse. All PREA related information, including postings; brochures and handouts are available in English and Spanish. Telephonic language translation services are contracted and available for offenders who are not English proficient; this service was used by the auditor to interview the LEP offender. The facility also employs staff members who are proficient in languages other than English, as well as sign language. The facility does not rely on offender interpreters, readers or other types of offender assistants in the performance of first responder duties or during the investigation of PREA allegations. Interviews with first responders, medical, mental health and investigative staff confirmed their awareness of the prohibition of using offender interpreters for discussing PREA related incidents. An interview with one LEP offender confirmed the availability and use of a staff interpreter. The review of policy and supporting documentation, as well as staff and offender interviews, confirm the facility's compliance with this standard.

Standard 115.17: Hiring and promotion decisions

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.17 (a)

- 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 No
- 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 No
- 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 question immediately above? Yes No
- 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 No
- 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 No
- 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 question immediately above? Yes No

115.17 (b)

- Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? Yes No

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency: perform a criminal background records check? Yes No
- 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 No

115.17 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? Yes No

115.17 (e)

- 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 No

115.17 (f)

- 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 No
- 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 No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? Yes No

115.17 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? Yes No

115.17 (h)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies Employee Section (AD-PR-05), Background Checks for Applicants and Current Employees (AD-PR-07), OP-WI-01-F1 and Agreement & Contracts (AD-GA-13) were reviewed and address the requirements of this standard. All employees and contractors who have contact with offenders have had a background check through the National Crime Information Center. Employee backgrounds are re-checked every five years. The auditor performed a random check of nine employee files which revealed background checks are being conducted in a timely manner and in accordance with this standard. The facility does not hire or promote anyone who may have contact with offenders and does not enlist the services of any contractor who may have contact with offenders who has engaged in any type of sexual abuse/sexual harassment. Employees have a duty to disclose such misconduct and material omissions regarding such misconduct would be grounds for termination. The submission of false information by any applicant is grounds for not hiring the applicant. The Human Resource Manager was interviewed and confirmed that the agency attempts to contact prior employers for information on substantiated allegations of sexual abuse or resignations which occurred during a pending investigation of sexual abuse. The Human Resource Associate (Manager) also confirmed that the agency provides 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. The agency notifies appropriate licensing/certifying agencies, when professional staff members are terminated for substantiated allegations of sexual abuse or sexual harassment. A review of policies and relevant supporting documentation and an interview with the Human Resource Associate confirms the facility's compliance with all requirements of this standard.

Standard 115.18: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.18 (a)

- 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.)
 Yes No NA

115.18 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the

agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)

Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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Policy Security Operations (IO-SC-06) applies to this standard. There have been no substantial expansions or technological monitoring improvements to the facility since the last audit. Based on a review of policy, interviews with staff and the observation/examination of cameras/mirrors and the monitoring points in the facility, the ICIW is considered compliant with this standard.

RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.21 (a)

- 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 No NA

115.21 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA
- 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 No NA

115.21 (c)

- 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 evidentiary or medically appropriate? Yes No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? Yes No
- 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 No
- Has the agency documented its efforts to provide SAFEs or SANEs? Yes No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? Yes No
- 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? Yes No
- Has the agency documented its efforts to secure services from rape crisis centers? Yes No

115.21 (e)

- 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 No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? Yes No

115.21 (f)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity 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.) Yes No NA

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- 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 attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.] Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies PREA-02, PREA-03, HSP-628, HSP-505, Escorted Trips (IO-SC-12) and Evidence Handling/Contraband Control (IO-SC-22) were reviewed and address the requirements of this standard. Interviews with correctional and health services personnel confirmed that they were all knowledgeable of the required procedures for obtaining, preserving and securing physical evidence, when sexual abuse is alleged. The agency and ICIW employees follow a uniform evidence protocol as described in the U.S. Department of Justice's Office on Violence against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents". Victims of sexual assault are referred to health services for initial examination and treatment. Such treatment would be for life preservation only and the victim would be transported to a local hospital for examination, treatment and forensic evidence gathering by a Sexual Abuse Nurse Examiner. Additionally, the local victim advocacy center servicing the facility will be contacted to request an advocate

to accompany the victim. ICIW staff members are also trained to provide victim advocacy services. There were no forensic medical examinations conducted during the past 12 months. All sexual abuse victim advocacy, examinations, treatment, testing and follow-up care are provided without cost to the victim. The facility's Memorandum of Understanding (MOU) with the local hospital was reviewed by the auditor. Administrative investigations are conducted by trained investigators who are full-time employees of the facility. The review of training records confirmed that investigators have received investigator training offered by the agency on the investigation of sexual abuse and sexual harassment in a confinement setting. A review of policies, procedures and training documents, as well as interviews with staff, a Sexual Abuse Nurse Examiner and one local victim advocate confirm the facility's compliance with this standard.

Standard 115.22: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.22 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? Yes No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? Yes No

115.22 (b)

- Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? Yes No
- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? Yes No
- Does the agency document all such referrals? Yes No

115.22 (c)

- If a separate entity is responsible for conducting criminal investigations, does such publication 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 No NA

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

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IDOC policies Employee Investigations & Disciplines (AD-PR-13), Major Discipline Report Procedures (IO-RD-03), PREA-01, PREA-02, PREA-03 and PREA-04 were reviewed and address the requirements of this standard. Policy requires administrative or criminal investigations to be completed on all allegations of sexual abuse/sexual harassment. All investigations that involve PREA issues are sent to the PREA Compliance Manager, who refers the matter to the Iowa Inspector General, who will assign an investigator. Administrative investigations are routinely assigned for completion by the trained investigators at the facility. Criminal investigations are referred to an outside agency such as the Division of Criminal Investigation, Law Enforcement and/or the County Attorney, depending upon the circumstances of the referral. A review of the investigative files of cases opened during the past 12 months alleging sexual abuse or sexual harassment was conducted. During the audit period, there were a total of twenty-six allegations (none criminal) of sexual abuse. The allegations reported by offenders involved offender-on-offender and staff-on-offender sexual abuse/sexual harassment. None of the cases required forensic evidence collection by a SANE service provider in the community. Twelve investigations were determined to be unsubstantiated, three were substantiated and eleven were unfounded. All investigations were completed promptly and thoroughly and were well documented. Agency policy requires all allegations of sexual abuse or sexual harassment referred for criminal investigation to be documented and published on its website. A review of training documents confirmed that all investigators received instruction in conducting sexual assault investigations in a confinement setting. Interviews with the Warden, PCM and two investigators, as well as an examination of policy, the training curriculum, eighteen investigation files, the agency's website and other supporting documentation, confirm the facility's compliance with this standard.

TRAINING AND EDUCATION

Standard 115.31: Employee training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No?
- 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 No
- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? Yes No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? Yes No
- 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 No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? Yes No
- 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 No
- 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 No

115.31 (b)

- Is such training tailored to the gender of the inmates at the employee's facility? Yes No
- 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 No

115.31 (c)

- Have all current employees who may have contact with inmates received such training?
 Yes No
- 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 No
- 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 No

115.31 (d)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies Orientation & Pre-Service Training (AD-TS-04) and In-Service Training (AD-TS-05) were reviewed and address the requirements of this standard. The ICIW annual training plan addresses all training required by this standard. All new employees are required to attend an orientation class and training which includes a PREA component prior to working in the facility. Also, the Human Resource Department shows a PREA informational video to all new staff. Related education is provided annually during refresher training. All employees completed the annual refresher training which included PREA topics. The agency provides extensive web-based E-Learning of PREA standards. The agency PREA E-Learning system requires an electronic signature of the employee documenting completion of the training. Additionally, they are required to affirm they understand the PREA training they have taken. Based on a review of policies, staff training files (nine were reviewed), training curriculum and supporting documentation, as well as interviews with training staff, to include the Human Resource Associate, the facility is considered compliant with this standard.

Standard 115.32: Volunteer and contractor training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.32 (a)

- 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 No

115.32 (b)

- Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)? Yes No

115.32 (c)

- Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies Volunteer Program (AD-CI-01), Offender Work Program (OP-WI-01) and PREA-02 were reviewed and address the requirements of this standard. A review of the training curriculum indicated the volunteers and contractors are trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, response and reporting policies and procedures. Contractor and volunteer interviews confirmed that the training was provided and that they understood the agency's zero-tolerance policy for sexual

abuse and sexual harassment and their responsibilities under the PREA. The annual refresher training is provided on the IDOC E-Learning system. The agency requires an electronic signature of the volunteers and contractors and an affirmation of completion and that they understand the PREA training they have received. Based on a review of policies, training curriculum and training records, as well as interviews with training staff, a contractor and volunteers, the facility is considered compliant with this standard.

Standard 115.33: Inmate education

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.33 (a)

- During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? Yes No
- During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment? Yes No

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No

115.33 (c)

- Have all inmates received such education? Yes No
- 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 No

115.33 (d)

- Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? Yes No

- Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? Yes No

115.33 (e)

- Does the agency maintain documentation of inmate participation in these education sessions? Yes No

115.33 (f)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies Offender Intake & Orientation (IS-RO-02), Inter-Institution Offender Transfer (IS-CL-08), PREA-01, PREA-02 and PREA-03 were reviewed and address the requirements of this standard. During intake and the orientation process, each offender receives a "Staying Safe-A Guide for Offender Conduct" pamphlet describing the agency's PREA compliance program. The information identifies the key elements of the program and informs offenders of the zero-tolerance policy regarding sexual abuse and sexual assault and multiple ways to

report sexual abuse/sexual harassment. The information also informs the offenders that both male and female staff members routinely work in and monitor the housing units. The information is available in English, Spanish and other languages. A staff member conducts an education program regarding the PREA for all offenders within three days of their arrival at the facility. The program includes definitions of sexually abusive behavior and sexual harassment, prevention strategies and reporting modalities. Offenders also view a comprehensive orientation video that explains the facility's zero-tolerance policy and covers the inmate's right to be free from sexual abuse, sexual harassment and retaliation for reporting a PREA violation. The offenders are required to sign an acknowledgement of the training and receipt for the pamphlet. There are zero-tolerance posters throughout the facility and crisis intervention telephone numbers posted prominently. The review of policies and documentation and interviews with staff and offenders confirm that the facility is in compliance with this standard.

Standard 115.34: Specialized training: Investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.34 (a)

- 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 have received 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 No NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA
- 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 No NA
- 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 No NA
- 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 No NA

115.34 (c)

- 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 No NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-01, PREA-02, PREA-03, HSP-628 and the IDOC PREA Investigator Training Curriculum were reviewed and address the requirements of this standard. The facility and Inspector General (IG) sexual violence investigators have all received PREA specialized training that includes all the criteria referenced in this standard. The auditor reviewed specialized training records for facility and IG investigators. Administrative investigations are usually conducted by trained investigators from the facility. Based on interviews with an investigator and the PREA Coordinator and an examination of policy, lesson plans, investigations and supporting documentation, the facility is considered to be in compliance with this standard.

Standard 115.35: Specialized training: Medical and mental health care

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.35 (a)

- 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? Yes No

- 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? Yes No
- 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? Yes No
- 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? Yes No

115.35 (b)

- If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.) Yes No NA

115.35 (c)

- 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? Yes No

115.35 (d)

- Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? Yes No
- Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policy HSP-628 and the Annual PREA Training Records were reviewed and address the requirements of this standard. The policy states 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 how to detect and assess signs of sexual violence, how to preserve physical evidence of sexual violence, how to respond effectively and professionally to victims of sexual violence and how and who to report allegations or suspicions of sexual violence. The auditor reviewed the policy and training lesson plan. A review of training documents indicate all of the medical and mental health staff have received specialized training as required. Staff also receive refresher training annually and documentation of this instruction is on file. The facility has a MOU with a local hospital to provide SANE services, if the need arises. No forensic examinations were completed during the audit period. A review of policies, training lesson plans and records, as well as interviews with medical and mental health staff, confirm the facility's compliance with this standard.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.41 (a)

- 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 No
- 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 No

115.41 (b)

- Do intake screenings ordinarily take place within 72 hours of arrival at the facility?
 Yes No

115.41 (c)

- Are all PREA screening assessments conducted using an objective screening instrument?
 Yes No

115.41 (d)

- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No

115.41 (e)

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse? Yes No

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses? Yes No
- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse? Yes No

115.41 (f)

- 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 No

115.41 (g)

- Does the facility reassess an inmate's risk level when warranted due to a: Referral? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Request? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness? Yes No

115.41 (h)

- 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 No

115.41 (i)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies Offender Classification (IS-CL-08), IS-CL-02, IS-RO-01 and the Sexual Violence Propensity (SVP) Scoring Guide were reviewed and address this standard. All offenders are assessed at intake using the IDOC SVP Intake Screening Tool within 24 hours of admission and they are given an SVP rating. This is scanned into the offender's electronic record ICON. Additionally, the initial medical screening involves the use of the Modified MINI (Modified Mini Screen). This instrument offers offenders who have previously been victims or perpetrators of sexual abuse a follow-up meeting with a mental health practitioner. The Psychology Department will then schedule any requests for follow-up within 14 days. If there is a potential for sexual aggression or victimization discovered during this process, the individual is placed in single cell status until further assessment. Further assessment is completed by a Counselor or Psychologist within three work days. Within 30 days, a reassessment will be conducted during classification to consider any new information recently obtained. In the past twelve months, all offenders entering the facility were screened for risk of sexual victimization or risk of sexually abusing other offenders. All offenders were also reassessed within 30 days after their arrival to the facility. Offenders are not disciplined for refusing to answer or for not disclosing complete information during the screening process. Information received during the screening process is confidential and only available to staff with a need-to-know and never to other offenders. Based on a review of policies and screening instruments and interviews with offenders, intake and medical and mental health staff, the facility is considered compliant with this standard.

Standard 115.42: Use of screening information

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.42 (a)

- 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 No
- 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 No

- 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 No
- 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 No
- 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 No

115.42 (b)

- Does the agency make individualized determinations about how to ensure the safety of each inmate? Yes No

115.42 (c)

- 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 No
- 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 No

115.42 (d)

- 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 No

115.42 (e)

- 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 No

115.42 (f)

- Are transgender and intersex inmates given the opportunity to shower separately from other inmates? Yes No

115.42 (g)

- 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? Yes No

- 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? Yes No

- 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? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies IS-RO-02, Offender Intake and Orientation (IS-CL-09) and HSP-704 were reviewed and address the requirements of this standard. Policy indicates all offenders shall be assessed using the Sexual Violence Propensity (SVP) Assessment. Screening information is used to determine housing, bed, work, education and program assignments, with the goal of keeping offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. Housing and program assignments are completed on a case-by-case basis with continued follow-up and monitoring. Placement and programming assignments for transgender and intersex offenders are reassessed at least twice a year or if a situation indicates the need for an immediate reassessment. By policy, transgender and intersex offenders are given the opportunity to shower separately from other offenders and the offender’s own views with respect to his/her safety are given serious consideration (confirmed through an interview with three transgender offenders). There is no dedicated

housing for gay, bisexual, transgender or intersex offenders at ICIW. Based on a review of policies and supporting documentation, interviews with staff and offenders and observations of the facility intake procedures, the ICIW is considered compliant with this standard.

Standard 115.43: Protective Custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.43 (a)

- 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 No
- 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 No

115.43 (b)

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? Yes No
- 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 No
- 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 No
- 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 No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? Yes No

115.43 (c)

- 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 No
- Does such an assignment not ordinarily exceed a period of 30 days? Yes No

115.43 (d)

- 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 No
- 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 No

115.43 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies Short Term Restricted Housing (IO-HO-05) and Protective Custody Housing (IO-HO-06) were reviewed and address the requirements of this standard. Offenders that are at a high risk for sexual victimization shall not be placed in involuntary Protective Custody (Special Housing Unit or SHU) housing, unless an assessment of all available alternatives has been made and a determination has been made that there are no available alternative means of separation from likely abusers. If such an assessment cannot be conducted immediately, the facility may hold the offender in involuntary Protective Custody housing for less than 24 hours while completing the assessment. In the past 12 months, there were no instances of any

offenders being held in involuntary segregated housing. The facility has alternatives in place to avoid this placement. Based on a review of policies, interviews with the PCM, a Unit Manager (supervisor of the SHU) and SHU officers, as well as an inspection of the SHU, the facility is considered compliant with this standard.

REPORTING

Standard 115.51: Inmate reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? Yes No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? Yes No
- Does that private entity or office allow the inmate to remain anonymous upon request? Yes No
- 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? Yes No

115.51 (c)

- Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? Yes No
- Does staff promptly document any verbal reports of sexual abuse and sexual harassment? Yes No

115.51 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-01 which includes the attachment "Staying Safe-A Guide for Offender Conduct", PREA-02, PREA-03 and the Offender Rulebook were reviewed and address the requirements of this standard. Policies are in place to ensure multiple internal and external ways for offenders to report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse or sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents. PREA reporting methods are explained by staff to offenders at intake, during orientation, in the PREA brochures, handouts and on posters displayed throughout the facility. According to interviews with a random sample of staff and offenders, an offender may report an incident of sexual abuse, sexual threats or any act of retaliation verbally or in writing, anonymously and through third parties. Staff members were also aware of ways they could report privately the sexual abuse and sexual harassment of offenders. Verbal reports are promptly documented. Offenders can report a PREA incident to any staff member in person, in writing or by using the kiosk system (electronic mail). The kiosk system also has a mailbox for the PREA Retaliation Monitor. Offenders may report allegations in writing to the IDOC Ombudsman Office as an outside agency. Offenders at ICIW are not detained solely for civil immigration purposes. Based on a review of policies, procedures, brochures and posters and interviews with a random sample of staff and offenders, the facility is considered compliant with this standard.

Standard 115.52: Exhaustion of administrative remedies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.52 (a)

- 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. Yes No NA

115.52 (b)

- Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) Yes No 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.) Yes No NA

115.52 (c)

- Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) Yes No 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.) Yes No NA

115.52 (d)

- Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) Yes No 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.) Yes No 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.) Yes No NA

115.52 (e)

- Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies

relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)

Yes No 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.) Yes No 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.) Yes No NA

115.52 (f)

- Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) Yes No 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.) Yes No 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.) Yes No 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.) Yes No 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.) Yes No 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.) Yes No 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.) Yes No NA

115.52 (g)

- If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policy Offender Grievance Procedures (IO-OR-06) addresses this standard. Due to the seriousness of an alleged PREA violation, a grievance immediately becomes a formal investigation. The policy states “Allegations of offender-on-offender 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 offender submits a complaint to the grievance officer, it will be sent to the Administrator of the Division of Investigative Services in the Central Office for investigation (the IG-refer to IDOC Policy PREA-01, Offender PREA Information for reporting processes). Based on a review of policy and an interview with the PCM, the facility is in compliance with this standard.

Standard 115.53: Inmate access to outside confidential support services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.53 (a)

- 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 No
- 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? Yes No
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? Yes No

115.53 (b)

- Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? Yes No

115.53 (c)

- 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 No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policy PREA-01 and the Offender Rulebook were reviewed and address this standard. The Rulebook and PREA Brochure identify numerous victim advocate programs in Iowa and contact information for the local victim advocate. ICIW has a Memo of Understanding (MOU) with the local community service provider. ICIW also has staff trained to serve as victim advocates, as confirmed through an interview with one of the staff victim advocates. An interview with the local victim advocate confirmed that they are available to support offenders at the facility and would provide emotional support related to sexual abuse. A phone call to RAINN (Rape, Abuse, and Incest National Network) by the auditor resulted in a referral to the local victim advocate. This phone number and other contact information is provided to offenders. Based on a review of policies, documentation and procedures and interviews with the Warden, PCM and victim advocates, the facility is considered compliant with this standard.

Standard 115.54: Third-party reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.54 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? Yes No
- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02, PREA-03 and the IDOC website were reviewed and address the requirements of this standard. The IDOC has established a procedure to receive third-party reports of sexual abuse and sexual harassment and distribute public information on how to report sexual abuse and sexual harassment on behalf of an offender. Posters are displayed giving visitors and offenders information on how to report. The IDOC website also explains that a report can be made via the internet to their agency. Interviews with staff and offenders revealed they were aware of the ability to have a third-party make a report of sexual abuse or sexual harassment, in writing, anonymously or verbally. Based on review of policies, brochures, posters and the IDOC website, as well as interviews with staff and offenders, the facility is compliant with this standard.

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.61 (a)

- 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 No
- 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 No
- 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 No

115.61 (b)

- Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions? Yes No

115.61 (c)

- 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 No
- 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 No

115.61 (d)

- 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 No

115.61 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02, PREA-03 and HSP-628 were reviewed and address the requirements of this standard. Policies are in place to ensure the agency requires 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, any retaliation against offenders or staff who reported such an incident and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The employee is required to report the specific details, in writing, immediately after verbal notification or an observation. Policies are in place to ensure, apart from reporting to designated supervisors or officials, staff do not reveal 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. Policy is in place to ensure, unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners are required to report sexual abuse pursuant to the first paragraph of this section and to inform offenders of the practitioner's duty to report and the limitations of confidentiality, at the initiation of services. According to interviews with the facility medical and mental health staff, at the initiation of services to an offender, they are advised as to the limitations of confidentiality and their duty to report. Staff reported they are required to report any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment to a designated supervisor or official immediately upon learning of it. The ICIW does not house any offenders under the age of 18. Based on a review of policies and procedures, interviews with the Warden, PCM, medical and mental health staff and a random sample of other staff, the facility is considered compliant with this standard.

Standard 115.62: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.62 (a)

- 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 No

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02 and PREA-03 were reviewed and address the requirements of this standard. All staff members interviewed were aware of their duties to act immediately to protect the offender if they learned there was a threat of imminent sexual abuse. They also indicated they would report the incident to their immediate supervisor for further investigation. The staff interviewed stated they would separate offenders, secure the scene, protect possible evidence and not allow offenders to destroy possible evidence. During the past 12 months, there were no offenders determined to be subject to a substantial risk of imminent sexual abuse and requiring immediate protective action. A review of policies and procedures, as well as interviews with the Warden, PCM and a random sample of staff, support a conclusion that the ICIW is compliant with this standard.

Standard 115.63: Reporting to other confinement facilities

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.63 (a)

- 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 No

115.63 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation? Yes No

115.63 (c)

- Does the agency document that it has provided such notification? Yes No

115.63 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02 and PREA-03 were reviewed and address this standard. The IDOC has policies and procedures in place to ensure, upon receiving an allegation that an offender was sexually abused while confined at another facility, the Warden of the facility that received the allegation shall notify the Warden of the facility where the alleged abuse occurred and the Inspector General. The notifications are made as soon as possible, but no later than 72 hours after receiving the allegation. During the past 12 months, ICIW received one allegation of sexual abuse that occurred in another facility. The allegation was immediately referred for investigation per policy. During In the past 12 months, there were no allegations of sexual abuse that may have occurred at the ICIW received from other facilities. Based on review of policies and documentation and interviews with the PREA Coordinator, PCM and Warden, the facility is considered compliant with this standard.

Standard 115.64: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.64 (a)

- 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 No
- 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 No
- 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 No

- 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 No

115.64 (b)

- If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-01, PREA-02 and PREA-03 were reviewed and address the requirements of this standard. Policies are in place to ensure, upon learning of an allegation that an offender was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser and preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. If the abuse occurred within a time period that still allows for the collection of physical evidence, staff will request that the alleged victim not take any action that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, drinking or eating. In the past 12 months there were sixteen allegations of sexual abuse at the ICIW requiring first responder intervention. All staff interviewed confirmed they are trained and could respond as a first responder, if necessary. Policies are also in place to ensure, if the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff. Of the sixteen allegations reported, a security staff member was the first responder in each instance.

Based on a review of policies, interviews with the PCM and a random sample of staff, the ICIW meets the requirement of this standard.

Standard 115.65: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.65 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02 1nd PREA-03 were reviewed and address this standard. The ICIW has established a checklist to coordinate actions taken in response to incidents of offender sexual abuse among facility leadership, staff first responders, investigators and facility medical and mental health practitioners. The facility plans dictate that the response to an allegation of sexual abuse requires a coordinated effort between security staff, the Inspector General's office, medical/ mental health services and a victim advocate in the process. All employees interviewed were aware of the necessary procedures to be followed. Based on a review of the policies and interviews with the facility Warden, PCM, Investigator, the local victim advocate, medical, mental health and other random staff, the ICIW is compliant with the requirements of this standard.

Standard 115.66: Preservation of ability to protect inmates from contact with abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.66 (a)

- 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 limits 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 No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Collective Bargaining Agreement between the State of Iowa and the American Federation of State County, and Municipal Employees (AFSCME) was reviewed and found to be compliant with this standard. There were no noted restrictions for removing alleged staff abusers from contact with any offenders pending the outcome of an investigation or a determination of whether and to what extent discipline is warranted. Based on a review of the AFSCME contract and an interview with the PREA Coordinator, the ICIW is considered compliant with this standard.

Standard 115.67: Agency protection against retaliation

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.67 (a)

- 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 No

- Has the agency designated which staff members or departments are charged with monitoring retaliation? Yes No

115.67 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? Yes No

115.67 (c)

- 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 residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No

- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? Yes No

115.67 (d)

- In the case of inmates, does such monitoring also include periodic status checks?
 Yes No

115.67 (e)

- 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 No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies PREA-02 and PREA-03 were reviewed and address this standard. Policy prohibits any type of retaliation against any employee or offender who has reported sexual abuse or sexual harassment or cooperated in any PREA investigation. A Captain is designated as the Retaliation Monitor. When interviewed, he stated he would conduct checks with the offenders or staff in person at least monthly or as needed up to 90 days or as long as necessary to make sure they are safe from retaliation. As part of the monitoring, a review of the offender files for changes that may reflect retaliation concerns, including housing changes, program changes, job assignment changes and disciplinary reports is completed. Offenders have access to a kiosk system which has a mailbox for the PREA Retaliation Monitor. In the past 12 months, there was one incident of retaliation reported. All required responses to this incident were followed. Based on a review of policies and the Retaliation Log and interviews with the Warden and Retaliation Monitor, the facility is considered compliant with this standard.

Standard 115.68: Post-allegation protective custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.68 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policy IO-HO-06 was reviewed and addresses this standard. Policy requires staff to assess and consider all appropriate alternatives for safeguarding alleged offender victims of sexual abuse/sexual harassment. The requirements listed in 115.43 would be enforced. Staff must first consider other alternatives based on the circumstances of the allegation before considering the placement of an offender in Protective Custody (SHU), placing her in another housing unit or transferring the offender to another facility. However, in practice, offenders would almost never be placed in this status, but would be transferred to another housing unit or prison. To the extent possible, access to programs, privileges, education and work opportunities would not be limited to offenders placed in a SHU for the purpose of Protective Custody. Any reasons for restricting this access and the length of time the restrictions would last would be documented. There were no offenders placed in post-allegation Protective Custody status within the last twelve months. Compliance with this standard was determined by a review of policy and documentation, as well as a tour of the ICIW (including the SHU) and staff interviews. Based on review of policies and interviews with the Warden and staff who supervise offenders in the SHU, the facility is considered compliant with this standard.

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.71 (a)

- 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 No NA
- 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 No NA

115.71 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? Yes No

115.71 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? Yes No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses?
 Yes No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? Yes No

115.71 (d)

- 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 No

115.71 (e)

- 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 No
- 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 No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? Yes No
- 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 No

115.71 (g)

- 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 No

115.71 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? Yes No

115.71 (i)

- 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 No

115.71 (j)

- 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 No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (l)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies PREA-02 and PREA-03 were reviewed and address this standard. The agency conducts its own investigations into allegations of sexual abuse and sexual harassment. All investigations are completed promptly, thoroughly and objectively for all allegations, including third-party and anonymous reports. 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 offender or staff. The agency does not require an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Substantiated allegations of conduct that appear to be criminal are referred for prosecution, when the quality of evidence appears to support criminal prosecution. There are seven trained investigators at the ICIW and three specialize in PREA cases. The interviewed investigators were aware of the proper investigative procedures for administrative and criminal cases. There were no criminal investigations during this audit period and no substantiated allegations that were referred for prosecution since the last PREA audit. The facility investigators stated they would cooperate fully with any outside agency that conducts an investigation. Based on the review of policies and specialized training curriculum, as well as interviews with the PCM and investigators, the ICIW is considered compliant with this standard.

Standard 115.72: Evidentiary standard for administrative investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.72 (a)

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies PREA-02 and PREA-03 were reviewed and address this standard. Policies are in place to ensure the agency imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Investigator interviews revealed they understood the evidence standard is a preponderance of the evidence. Review of the investigation files also revealed this standard was used as required. Based on a review of policy and the training curriculum, as well as interviews with the Warden, PREA Coordinator and facility investigators, the ICIW is considered compliant with this standard.

Standard 115.73: Reporting to inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.73 (a)

- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? Yes No

115.73 (b)

- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) Yes No NA

115.73 (c)

- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility? Yes No

- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? Yes No

115.73 (d)

- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility? Yes No
- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? Yes No

115.73 (e)

- Does the agency document all such notifications or attempted notifications? Yes No

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-02 and PREA-03 were reviewed and address this standard. Policies are in place to ensure that following an investigation into an offender's allegation that they suffered sexual abuse, the ICIW informs the offender as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The number of administrative investigations of alleged offender sexual abuse that were completed in the past 12 months was twenty-six. All the outcome notifications of closed investigations were made to the offender by the facility. The notifications of the outcome were documented in the investigation case files and reviewed by the auditor. If the allegation of sexual abuse was by a staff member, the policy requires the Warden to inform the offender (unless the allegation is unfounded) of the status of the staff member, to include whether the staff member is no longer posted within the offender'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 and/or the agency learns the staff member has been convicted on a charge related to sexual abuse within the facility. Based on review of policy, procedures and closure letters and interviews with Warden, investigators and PCM, the ICIW is considered compliant with this standard.

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.76 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? Yes No

115.76 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? Yes No

115.76 (c)

- 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 No

115.76 (d)

- 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 No

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policy PREA-02 and PREA-03 was reviewed and addresses this standard. The policy is in place to ensure employees are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. The policy ensures termination is the presumptive disciplinary sanction for staff members who have engaged in sexual abuse. Policies are in place to ensure 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. The Collective Bargaining Agreement between the State of Iowa and the American Federation of State, County and Municipal Employees allows for disciplinary sanctions against staff, including termination for sexual abuse or sexual harassment of an offender. The facility had no employees terminated due to an incident of sexual harassment or sexual misconduct during the past 12 months, however, two staff resigned pending termination after allegations of sexual misconduct were uncovered. No staff members have been disciplined otherwise for violation of agency sexual abuse or sexual harassment policies in the last twelve months. Policy would require that staff be reported to law enforcement or licensing boards following their termination or resignation prior to termination for violating agency sexual abuse or sexual harassment policies. Based on a review of policies and files and interviews with the Human Resource Associate, PCM and Warden, the ICIW meets the requirements of this standard.

Standard 115.77: Corrective action for contractors and volunteers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.77 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? Yes No

115.77 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies AD-CI-01, AD-GA-13 and PREA-02 were reviewed and address the requirements of this standard. Policy is designed to ensure any contractor or volunteer, who engages in sexual abuse, is prohibited from contact with offenders and is reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies if necessary. This requirement is covered in the volunteer and contractor training and orientation, which also includes the mandate to sign forms indicating they have received and understand the PREA training. Interviews with a contractor and volunteers confirmed they were aware of the policies and the remedial measures that could occur for engaging in the sexual abuse or sexual harassment of offenders. Policies are in place to ensure the facility takes appropriate remedial measures and considers whether to prohibit further contact with offenders, in case there are any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. In the past 12 months, there have been no contractors or volunteers who have violated the agency sexual abuse or sexual harassment policies. Based

on a review of policies, procedures and training curriculum and interviews with the Warden, Chaplain, volunteers and a contractor, the ICIW meets the requirement of this standard.

Standard 115.78: Disciplinary sanctions for inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.78 (a)

- 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 No

115.78 (b)

- Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories? Yes No

115.78 (c)

- 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 No

115.78 (d)

- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? Yes No

115.78 (e)

- 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 No

115.78 (f)

- 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 No

115.78 (g)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-01, IO-RD-03 and Sex Offender Program Referrals (OP-SOP-08) were reviewed and address this standard. Policy indicates sanctions shall be commensurate with the nature and circumstances of the abuse committed, the offender's disciplinary history and the sanctions imposed for comparable offenses by other offenders with similar histories. The disciplinary process shall consider whether an offender's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed. During the last 12 months, there have been three substantiated findings and no criminal referrals for offender-on-offender sexual abuse that has occurred at the facility. Policies are in place to ensure the facility offers therapy, counseling or other interventions designed to address and correct underlying reasons or motivations for the abuse. The facility considers whether to require the offending offender to participate in such interventions as a condition of access to programming or other benefits. The facility would discipline an offender for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Policies are in place to ensure, for the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. The ICIW prohibits all sexual activity between offenders and disciplines offenders for such activity. The agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced. Based on review of policies and procedures and interviews with the Warden, PCM and mental health staff, the facility is considered compliant with this standard.

MEDICAL AND MENTAL CARE

Standard 115.81: Medical and mental health screenings; history of sexual abuse

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.81 (a)

- 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 No NA

115.81 (b)

- If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.) Yes No NA

115.81 (c)

- 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? Yes No

115.81 (d)

- 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 No

115.81 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

- Does Not Meet Standard** (Requires Corrective Action)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies HSP-628, IS-RO-01 and IS-RO-02 were reviewed and address this standard. All offenders are assessed at intake using the IDOC SVP Intake Screening Tool within 24 hours of admission and they are given an SVP rating. This information is scanned into the offender's electronic record ICON. Additionally, the initial medical screening involves the use of the Modified MINI (Modified Mini Screen). This instrument offers offenders who have previously been victims or perpetrators of sexual abuse a follow-up meeting with a mental health practitioner. The Psychology Department then picks up the MINI daily and will schedule any follow-up within 14 days. If there is a potential for sexual aggression or victimization indicated during this process, further assessment is completed by a Counselor or Psychologist within three work days. Documentation confirmed that all offenders who disclosed victimization during screening were offered a follow-up meeting with mental health staff. Based on a review of policies and supporting documentation and interviews with intake, medical and mental health staff, the ICIW meets the requirements of this standard.

Standard 115.82: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.82 (a)

- 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 No

115.82 (b)

- If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? Yes No
- Do security staff first responders immediately notify the appropriate medical and mental health practitioners? Yes No

115.82 (c)

- 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 No

115.82 (d)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policies HSP-628 and HSP505 were reviewed and address this standard. The facility would provide any immediate medical treatment necessary and the offender would be transported to a local hospital for further assessment, if necessary. The local victim advocate would also be contacted, as confirmed by an interview with a hospital SANE employee. The treatment will be offered at no financial cost to the victim. Policy states that offender victims of sexual abuse shall 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. Offender victims of sexual abuse, while incarcerated, shall be offered timely information about and timely access to sexually transmitted infections, contraception and pregnancy prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. This is an all-female facility and services offered would be for the female population. Based on a review of the policy and interviews with medical and mental health staff, the ICIW is considered compliant with this standard.

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

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.83 (a)

- 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 No

115.83 (b)

- Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? Yes No

115.83 (c)

- Does the facility provide such victims with medical and mental health services consistent with the community level of care? Yes No

115.83 (d)

- Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.) Yes No NA

115.83 (e)

- 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.) Yes No NA

115.83 (f)

- Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate? Yes No

115.83 (g)

- 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 No

115.83 (h)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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IDOC policy HSP-628 was reviewed and addresses this standard. Ongoing medical and counseling services related to a sexual abuse incident will be provided at no charge to the offender. The evaluation and treatment of such victims shall include follow-up services, treatment plans and, when necessary, referrals for continued care following their transfer to, or placement in other facilities. Offender victims of sexual abuse, while incarcerated, shall be offered tests for sexually transmitted infections, contraception and pregnancy prophylaxis, as medically appropriate. This is an all-female facility and services offered would be for a female population. Based on a review of the policy and supporting documentation and interviews with medical and mental health staff, the ICIW is considered compliant with this standard.

DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.86 (a)

- 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 No

115.86 (b)

- Does such review ordinarily occur within 30 days of the conclusion of the investigation?
 Yes No

115.86 (c)

- Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? Yes No

115.86 (d)

- 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 No
- 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 No
- 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 No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? Yes No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? Yes No
- 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 No

115.86 (e)

- Does the facility implement the recommendations for improvement, or document its reasons for not doing so? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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not meet the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-2 and PREA-03 were reviewed and address this standard. The facility shall conduct a sexual violence incident review at the conclusion of every sexual violence investigation that results in a substantiated or unsubstantiated finding. The review will ordinarily occur within 30 days of the conclusion of the investigation. During the past 12 months, all required reviews were completed within 30 days and documented. The review team will include the Warden or designee and other upper-level management team members responsible for the area of the facility where the incident occurred. Shift supervisors, at least one sexual violence investigator on the case, medical or mental health practitioners, the PCM (the team chairperson) and the PREA Coordinator may also be team members. The team determines if the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse. They consider whether the incident or allegation was motivated by race, ethnicity, gender identity (whether offender was lesbian, bisexual, transgender or intersex) or other status. They also consider if gang membership was involved or whether the incident was otherwise caused by other group dynamics. The team examines the area where the incident occurred to assess whether physical barriers may enable abuse, the adequacy of staffing levels and whether monitoring technology should be deployed or augmented to supplement supervision by staff. Based on a review of the policy and sexual abuse incident review reports, as well as interviews with the Warden and PCM, the ICIW complies with the requirements of this standard.

Standard 115.87: Data collection

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.87 (a)

- 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 No

115.87 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually? Yes No

115.87 (c)

- 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 No

115.87 (d)

- 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 No

115.87 (e)

- Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.) Yes No NA

115.87 (f)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policies PREA-1, PREA-2, PREA-3 and PREA-04 were reviewed and address this standard. The policy is in place to ensure 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 and collects data as needed from all available incident-based documents, including reports, investigation files and sexual abuse incident reviews. This process includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the U.S. Department of Justice. The agency aggregates all data annually and posts it on their website for public review. Based on an interview with the PREA Coordinator and a review of the Annual Reports, the ICIW and agency are considered compliant with this standard.

Standard 115.88: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.88 (a)

- 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 No
- 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 No
- 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 No

115.88 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse? Yes No

115.88 (c)

- 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 No

115.88 (d)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC Policy PREA-04 and the IDOC Website were reviewed and address this standard. Per policy, the agency will compile, review and assess all sexual abuse/sexual harassment cases at least annually to improve the effectiveness of its sexual abuse prevention, detection and response policies. The data is used to determine appropriate interventions, enhancements to staff and offender training, assessment of appropriate housing for victims/predators, policy updates and revisions to enhance operational aspects designed to provide safer prisons. Annual staffing plan reviews, assessment of current use of monitoring/surveillance equipment and facility infrastructure modifications are data that may assist the IDOC in making determinations. The ICIW PCM forwards data to the Iowa Department of Corrections (IG). An annual report is prepared and placed on the department's website, <https://doc.iowa.gov/administration/prea/annual-prea-reports>. Based on review of the policy and the 2018 annual report published on the IDOC website, as well as an interview with the PREA Coordinator, the agency and ICIW is considered compliant with this standard.

Standard 115.89: Data storage, publication, and destruction

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.89 (a)

- Does the agency ensure that data collected pursuant to § 115.87 are securely retained?
 Yes No

115.89 (b)

- Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means? Yes No

115.89 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? Yes No

115.89 (d)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

IDOC policy PREA-04 and the IDOC Website were reviewed and address this standard. The PREA Coordinator reviews data compiled and issues a report to the Iowa Department of Corrections. Policy is in place to ensure, before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The data is securely retained and published on the IDOC website. Policy states sexual abuse data shall be retained for at least 10 years after the date of the initial collection. Based on review of policy and the 2018 annual report on the IDOC website, as well as an interview with the PREA Coordinator, the agency and ICIW is considered compliant with this standard.

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.401 (a)

- During the three-year period starting on August 20, 2013, and during each three-year period thereafter, 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? (N/A before August 20, 2016.)
 Yes No NA

115.401 (b)

- During each one-year period starting on August 20, 2013, 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? Yes No

115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility?
 Yes No

115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? Yes No

115.401 (m)

- Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?
 Yes No

115.401 (n)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The IDOC is in compliance with the 3-year period for completing PREA audits based on a review of its website and an interview with the PREA Coordinator. The auditor had access and was able to observe all areas of the facility. The auditor was able to request, review and receive all relevant documents, including electronically stored documents. The auditor was permitted to conduct private interviews of staff and offenders. Notices of the PREA audit were posted on January 18, 2019. Interviews with random offenders indicated they were aware of the postings. No offenders sent letters to the auditor requesting to be interviewed. During the on-site audit, one offender requested and was granted an interview with the auditor.

Standard 115.403: Audit contents and findings

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeals 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 that there has never been a Final Audit Report issued.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

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The IDOC has all PREA final reports published on the agency's website within 90 days after the final report is issued by the auditor. The agency has continuously provided these documents on their website since 2014. A review of the agency's website indicated compliance with this standard.

AUDITOR CERTIFICATION

I certify that:

- 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, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Signature

March 23, 2019

Date