PREA Facility Audit Report: Final

Name of Facility: Broward County Main Jail
Facility Type: Prison / Jail
Date Interim Report Submitted: 05/31/2024
Date Final Report Submitted: 09/11/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Brian D. Bivens	**Date of Signature:** 09/11/2024

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	04/15/2024
End Date of On-Site Audit:	04/19/2024

FACILITY INFORMATION	
Facility name:	Broward County Main Jail
Facility physical address:	555 Southeast 1st Avenue, Fort Lauderdale, Florida - 33301
Facility mailing address:	

Primary Contact

Name:	Captain Johanna Palacio-Harris
Email Address:	johanna_palacio-harris@sheriff.org
Telephone Number:	954-831-7081

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Facility PREA Compliance Manager	
Name:	Quentin Marion
Email Address:	quentin_marion@sheriff.org
Telephone Number:	O: 7868599896

Facility Health Service Administrator On-site	
Name:	Patricia Keathley
Email Address:	PKeathley@Wellpath.us
Telephone Number:	954-831-5859

Facility Characteristics	
Designed facility capacity:	1542
Current population of facility:	705
Average daily population for the past 12 months:	1124
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males

Age range of population:	16-91
Facility security levels/inmate custody levels:	Minimum/Medium/Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	728
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	398
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	171

AGENCY INFORMATION	
Name of agency:	Broward County Sherriff's Office
Governing authority or parent agency (if applicable):	Broward County
Physical Address:	2601 West Broward Boulevard, Fort Lauderdale, Florida - 33312
Mailing Address:	2601 West Broward Boulevard, Fort Lauderdale,
Telephone number:	9542687843

Agency Chief Executive Officer Information:	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Agency-Wide PREA Coordinator Information			
Name:	Joseph Lungha	**Email Address:**	joseph_lungha@sheriff.org

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
4	• 115.15 - Limits to cross-gender viewing and searches • 115.17 - Hiring and promotion decisions • 115.51 - Inmate reporting • 115.65 - Coordinated response
Number of standards met:	
41	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-04-15
2. End date of the onsite portion of the audit:	2024-04-19

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	The auditor contacted a representative at the Nancy J. Cotterman Center.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1542
15. Average daily population for the past 12 months:	1086
16. Number of inmate/resident/detainee housing units:	65
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	( ) Yes (●) No ( ) Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	1086
38. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	3
39. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	6
40. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
42. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	2
43. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2

44. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	5
45. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
46. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	5
47. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The Main Jail contains the Central Booking for all of Broward County. Once processed, females, juveniles, medical and mental health inmates may be rehoused in one of the other three Broward County Sheriff's Detention Facilities. General population females are housed at Paul Rein Detention Facility and female juveniles are housed out North Broward. Juvenile males are also housed at Paul Rein. The facility does not maintain accurate statistical information for questions 37-47.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	138

50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	171
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	398
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The majority of the contract staff are Trinity Kitchen Staff and WellPath medical and mental health employees. The numbers for volunteers and contract employees reflect the agency totals for all four detention facilities.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☑ Age ☑ Race ☑ Ethnicity (e.g., Hispanic, Non-Hispanic) ☑ Length of time in the facility ☑ Housing assignment ☑ Gender ☐ Other ☐ None

55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The auditor selected random inmates from the Main Jail Inmate Roster. The audit team conducted interviews in a private setting at each floor of the facility. Each inmate was advised of: - the fact that they did not have to speak to the audit team - the confidentiality of the conversation = out to report any type of retaliation for speaking to the auditor = the fact the audit team would not ask about their personal experiences - the fact that if the conversation brought of bad memories or flashbacks from their past, the audit team would ensure they get to speak to a mental health professional.
56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	(●) Yes ( ) No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no barriers in conducting inmate interviews. The audit team was provide a private area to complete all staff and inmate interviews.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	24

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/ resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/ residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

60. Enter the total number of interviews conducted with inmates/residents/ detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
61. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	6
62. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	There were no blind/low vision inmates housed at the Main Jail during the onsite portion of the audit according to the Facility Administration. Such inmates are moved to another Broward County Detention Facility after booking, orientation, and completing the Classification process.
63. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1

64. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
65. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
66. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	5
67. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According the PREA Coordinator and Facility Administration, there were no inmates housed in the facility for this category during the onsite portion of the audit.

68. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	5
69. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According the PREA Coordinator and Facility Administration, there were no inmates housed in the facility for this category during the onsite portion of the audit.

70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	The auditor selected random inmates from the Main Jail Inmate Roster. The audit team conducted interviews in a private setting at each floor of the facility. Each inmate was advised of: - the fact that they did not have to speak to the audit team - the confidentiality of the conversation - out to report any type of retaliation for speaking to the auditor - the fact the audit team would not ask about their personal experiences - the fact that if the conversation brought of bad memories or flashbacks from their past, the audit team would ensure they get to speak to a mental health professional.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	15
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☑ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No

74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	During the tour and throughout the site visit, the auditor randomly selected staff for random staff interviews. Interviews were conducted on various floors of the facility in private settings.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	23
76. Were you able to interview the Agency Head?	○ Yes ◉ No
a. Explain why it was not possible to interview the Agency Head:	The facility administrator was interviewed as the designee.
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	◉ Yes ○ No
78. Were you able to interview the PREA Coordinator?	◉ Yes ○ No
79. Were you able to interview the PREA Compliance Manager?	◉ Yes ○ No ○ NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☑ Agency contract administrator ☑ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☐ Line staff who supervise youthful inmates (if applicable) ☐ Education and program staff who work with youthful inmates (if applicable) ☑ Medical staff ☑ Mental health staff ☑ Non-medical staff involved in cross-gender strip or visual searches ☑ Administrative (human resources) staff ☑ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☑ Investigative staff responsible for conducting administrative investigations ☑ Investigative staff responsible for conducting criminal investigations ☑ Staff who perform screening for risk of victimization and abusiveness ☑ Staff who supervise inmates in segregated housing/residents in isolation ☑ Staff on the sexual abuse incident review team ☑ Designated staff member charged with monitoring retaliation ☑ First responders, both security and non-security staff ☑ Intake staff

	☐ Other
81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	8
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☑ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☑ Religious ☐ Other
82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	7
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☑ Medical/dental ☐ Food service ☐ Maintenance/construction ☐ Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	The auditor interviewed a GED instructor and a chaplain. The lead auditor also interviewed two random WellPath Medical Staff and three Trinity

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

88. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No
89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	The audit team visited all areas that were accessible to the inmate population. The facility is a high-rise and has eight floors; seven floors have housing units. Three pods on the fifth floor were empty. The lead auditor did make observations in each of these units. (5B1, 5B2, 5B3).

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No
91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	The lead auditor reviewed the following files: Sixteen PREA investigation files Twenty inmate files plus ten additional files to clarify some inconsistencies with inmate interviews. Fifteen Employee Human Resource and Training Files Eight Contract Employee Records Five Volunteer Training Records Random video footage showing inmates were given PREA Cards during the Intake Process in Central Booking

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	4	0	0	4
Staff-on-inmate sexual abuse	2	0	0	4
Total	6	0	0	6

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	8	0	8	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	10	0	10	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	2	5	1
Staff-on-inmate sexual harassment	0	2	0	0
Total	0	4	5	1

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	6

99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	4
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	2
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	10
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	8
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	The Mail Jail at the Broward County Sheriff's Office conducted sixteen PREA investigations during the past twelve months. Investigations and findings are as follows: Inmate on Inmate Sexual Harassment Unfounded 2, Unsubstantiated 5, Substantiated 1 Inmate on Inmate Sexual Abuse Unfounded 0, Unsubstantiated 3, Substantiated 1 Staff on Inmate Sexual Harassment Unfounded 2, Unsubstantiated 0, Substantiated 0 Staff on Inmate Sexual Abuse Unfounded 2, Unsubstantiated 0, Substantiated 0 The lead auditor reviewed all sixteen PREA investigations. The investigation files were found to be thorough and detailed with witness statements, photos, medical information, and a narrative describing the logical conclusion to the investigation. None of the sexual abuse allegations required a SANE or SAFE examination.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

Non-certified Support Staff

116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	◉ Yes ○ No

a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:	1

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?	(●) The audited facility or its parent agency ( ) My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) ( ) A third-party auditing entity (e.g., accreditation body, consulting firm) ( ) Other

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the documentation provided: as well as Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-2, Broward County Sheriff's Office Organization Chart, the auditor's observation, and interviews with the Agency-wide PREA Coordinator, and the Mail Jail PREA Manager, it was determined the Broward Sheriff's Office delineates compliance with Standard 115.11. 115.11 (a) The Broward Sheriff's Office staff follows the agency's policy, Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-26 which mandates zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. The auditor observed PREA information posted in each housing unit and in many common areas. Inmates are given PREA information upon intake at the Main Jail. This information is also given to each inmate when they are transferred to any of the Broward County Sheriff's Office facilities. Records review clearly showed that all staff, contract staff,

	and volunteers are trained on the agency's zero-tolerance policy against sexual abuse and sexual assault Informal conversations throughout the onsite process with both random staff and random inmates reviewed that the agency's PREA policy and processes are significantly embedded into the culture of the Mail Jail. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.11 (b) and (c) The agency employs an upper-level, agency-wide PREA Coordinator. The organization chart provided to the auditor shows the PREA Coordinator is an Executive Lieutenant and is an upper-level staff member with at least one PREA Manager at each of the four facilities. Lt. Lungha was appointed as the agency-wide PREA Coordinator. Lt. Lungha oversees the PREA process at the Mail Jail, the Paul Rein Facility, the North Broward Bureau, and the Joseph V. Conte Facility. Lt. Lungha reports directly to Major Kevin Corbett. Lt. Lungha is very knowledgeable of the PREA standards and actively assists the facility with compliance. Lt. Lungha has the authority to develop, implement, and oversee PREA compliance. He is actively updating the facility as new Frequently Ask Questions (FAQs) results are published on the PREA Resource Center website. The Broward Sheriff's Office Sheriff appointed Executive Lieutenant Quentin Marion to the position of PREA Manager at the Mail Jail. During interviews with the PREA Coordinator and the PREA Compliance Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The Broward Sheriff's Office meets this standard due to the fact it employs an agency-wide PREA Coordinator and a PREA Compliance Manager for each of the four facilities. Therefore, this standard was found to comply with this audit.

115.12	**Contracting with other entities for the confinement of inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.12 Based on the documentation provided: as well as, auditor observations, and interviews with the random staff, PREA Coordinator, and the Mail Jail PREA Manager, it was determined the Broward Sheriff's Office does not contract with other facilities to house inmates assigned to their custody. The Broward County Sheriff's Office does not contract with other agencies for the confinement of those in their custody. Therefore, this standard was found to comply with this audit.

115.13	**Supervision and monitoring**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Based on staff interviews, review of documentation provided, and review of the Broward Sheriff's Office staffing analysis (February 1, 2024), and Policy 11.1 Prison Rape Elimination Act (PREA). The following delineates the audit findings regarding this standard: 115.13 (a) The facility has documented and made its best efforts to comply on a regular basis with a 12-page staffing plan that provides for adequate levels of staffing as described and required by this standard. The established staffing plan uses the criteria found in standard 115.13 (a) 1. Generally Accepted Detention and Corrections Practices 2. Findings of Inadequacy: a. Judicial b. Federal Investigative Agencies c. Internal or External Oversight Bodies d. Applicable State and Local Laws, Regulations, or Standards 3. Facility Overviews a. Components of Physical Plant b. Composition of the Inmate Population c. Number and Placement of Supervisory Staff d. Institutional Programs and Schedule e. Prevalence of Substantiated and Unsubstantiated PREA Allegations f. Recommendations and Initiatives Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. There have not been any judicial findings of inadequacy in the past twelve months. During the onsite portion of the audit, the auditor did observe: - the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift - staff line of sight and assess whether there are blind spots - areas where persons confined in the facility are not allowed to determine whether

movement in and out of that space is monitored

- the level of supervision and frequency of cell checks in housing areas

- indirect supervision practices, including camera placement

No concerns were noted during the tour. Staffing levels in the Broward County Sheriff's Office staffing plan are agreed upon through an annual review process with all bargaining units. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on the shift roster and submitted to the PREA Manager outlining the reason(s) for the deviation. There has not been any deviation reported where the staffing plan had not been complied with in the past twelve months, as confirmed by written documentation and during an interview with the Mail Jail PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Major for review. It is then forwarded to Sheriff Tony ffor approval of any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The annual staffing plan is also reviewed by the Federation of Public Employees. The last Annual Staffing Plan assessment was completed on February 1, 2024. The next scheduled review date is February 2025. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (d) Based on Broward Sheriff’s Office Shift Supervisor interviews, facility JMS logs, staff interviews, and policy 11.1, Sexual Abuse, Prevention, and Response. Intermediate-level or higher-level supervisors (Sergeant and Lieutenants) are required to conduct and document unannounced rounds on all shifts as required. A random documentation review showed within 72 hours; more than a dozen unannounced rounds were conducted in each facility. The auditor reviewed the following timeframes during the past twelve months:

May 28-29, 2023 October 15-17, 2023
April 2-3, 2024

Such rounds are logged in the Jail Management System (JMS) inmate management software system. This was confirmed during an interview with a Lieutenant at the Mail Jail Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.14 Based on the auditor's observation, documentation provided, interviews with the Mail Jail PREA Manager, and PREA Coordinator, and staff interviews, the Mail Jail Facility is an all-adult facility and does not house youthful offenders. During the booking process, juveniles are kept separate from adult inmates and then transported to another BCSO facility (females to North Broward and males to Paul Rein Detention Center). Operations Order CI-21 states: 1. When juveniles enter the outside sallyport gates to be processed as adults, the arresting/transporting officer will notify the booking staff of their arrival. The juvenile will remain in the vehicle until the sallyport is cleared of adults. 2. Once the sallyport is cleared, the juvenile will be escorted through the booking area. The booking area will be locked down until the juvenile's booking process is completed. This was corroborated during interviews with the Intake Staff, PREA Manager, and the PREA Coordinator. There were no juveniles processed into the facility during the onsite portion of the audit. Therefore, this standard was found in compliance during this audit.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), SOP 5.9, SOP 11-1, training curriculums, fifteen staff interviews, two transgender inmate interviews, training file reviews, auditor observations, Interview with the PREA Manager, and documentation provided; the following delineates the audit findings regarding this standard: 115.15 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed that cross-gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of

	Search Preference. There have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. All fifteen random staff interviewed stated there are multiple males and females on duty every shift. This was reiterated during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (b) Broward County SOP 5.9 page 12 prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. This practice was confirmed during female inmate interviews. The PREA Coordinator advised the facility has not had a male pat search a female inmate for any reason in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) prohibits frisk/pat searches of female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. If a search is completed under exigent circumstances, the search is documented in the Jail Management System. There were no reported searches completed under exigent circumstances in the past twelve months. The PREA Coordinator advised the facility has not had a male pat search a female inmate for any reason in the past twelve months. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. Both transgender inmates interviewed stated they are allowed to ask for their preference in the gender of the staff member searching them. This practice was confirmed during female inmate interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 12 and 13) outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without a non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets, and changing their clothes. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) also require staff of the opposite gender to announce their presence prior to entering the housing units. Inmate and staff interviews revealed that opposite-gender announcements were common practice at this facility and reminders of this requirement are posted on the entry doors of all housing units exceeding the requirements of this part of the standard during this audit. During the onsite portion of the audit, the auditor did observe: - all areas where confined persons may be in a state of undress, such as showering, using the toilet, and/or changing their clothes

	- if any nonmedical staff of the opposite gender are able to view confined persons in a state of undress, including from different angles and via mirror placement - electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of confined persons There were no issues noted. Therefore, the facility exceeds compliance with this part of the standard during this audit. 115.15 (e) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13), the training curriculum provided, and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a contracted medical practitioner. This was corroborated during interviews two LBGTI inmates and fifteen random staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 6), training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This is outlined in the BCSO lesson plan and in S.O.P. 11-1. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. During interviews with two LBGTI inmates, it was confirmed that the inmates felt the staff conducted proper searches. There were also no complaints filed by the LBGTI inmates in the past twelve months related to searches according to the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16	**Inmates with disabilities and inmates who are limited English proficient**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practice, review of the lesson plans, and review of Language Line agreement, ERO Sign Language interpretation Services, invoices, inmate PREA education cards (English, Spanish, and Creole), interviews with twelve targeted inmates, PREA Manager, a First Responder, and three PREA investigators,

	PREA Posters, Inmate Handbooks (English, Spanish, and Creole) as well as staff and inmate interviews and facility tour; the following delineates the audit findings regarding this standard: 115.16 (a) The Broward Sheriff's Office takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through the PO2401780 Language Line Services. The facility also makes available TDD phones at each facility. The Mail Jail has a number of bi-lingual employees to assist with interpreter needs. During interviews with the twelve inmates (one deaf/hard of hearing, three with physical disabilities, six with cognitive disabilities, and two limited-English proficient) identified to meet the aspects of this standard, they all confirmed having received training and materials they could understand. The agency has multiple employees who are fluent in Spanish and Creole. The inmates and staff also confirmed that the Language Line is available when needed. The auditor was provided with invoices and payments for Language Line Services. There was one blind/low vision and one deaf/hearing impaired inmate to interview during the onsite visit. Both inmates displayed a solid working knowledge of the agency's zero tolerance for sexual abuse and sexual harassment and both were able to list the internal and external reporting mechanisms that the facility provides. During the onsite portion of the audit, the auditor: - tested the facility's process for securing interpretation services on demand - determined if persons confined in the facility must self-identify to access interpretation services - assessed the availability of interpretation services - observed the location of interpretation services No issues were noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (b) The Broward Sheriff's Office takes 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, including steps to provide interpreters who can interpret effectively accurately and impartially. Language Line interpreter services and/or staff interpreters are used to translate at

	this facility. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through Correct Care Solutions with the Language Line Services. There were twelve Spanish-speaking inmates interviewed (with the assistance of a staff interpreter) during the on-site visit and they confirmed during interviews receiving all written PREA information and viewing the Spanish version of the PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. The facility also makes TDD phones in each facility. The Mail Jail Facility has a large number of bi-lingual employees to assist with interpreter services. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9)) outlines these practices. Twelve inmates (one deaf/hard of hearing, three with physical disabilities, six with cognitive disabilities, and two limited-English proficient) Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9) illustrates the facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. PREA handouts, PREA postings, PREA Education Cards, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through the Language Line Services. This was confirmed during interviews with First Responders, the Mail Jail PREA Manager, and the PREA Investigators. During the onsite tour of the facility, the auditor observed (English, Spanish, and Creole) PREA information posted in numerous locations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 4 and 5), Human Resource staff interviews, PREA Coordinator, and personnel file reviews; Sheriff's Policy Manual 2.1 Employee Standards of Conduct, the following delineates the audit findings regarding this standard: 115.17 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 4-5) outlines that Broward Sheriff's Office does not hire or promote anyone

	who may have contact with inmates, and does not enlist the services of any contractor or volunteer 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, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The facility completes thorough background checks on all applicants; as well as a background check is completed on all new applicants confirming compliance. The agency has fourteen trained background investigators. Background investigations (dependent upon the length of employment of the employee) may include a combination of the following: ATMS BSO CAD BSO Records BSO Warrants CCIS Credit Card (Equifax) e-Agent D.A.V.I.D. FDPR Florida Conceal Weapons Permit Interpol Juvenile Justice Info System Military History National Decertification Database Odyssey Selective Service Verification Some files selected reflected staff that was hired 25+ years ago; the background process, including specific background software utilized has changed during the past three decades. This practice was confirmed during interviews with the agency's

Human Resource Director and the PREA Investigator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Broward Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer, who may have contact with inmates. This was confirmed during the review of four human resource files for contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 The Broward Sheriff's Office requires a criminal background record check to be completed before hiring any new employee. Thirty out of thirty Human Resource files confirmed this practice. The agency has fourteen trained background investigators. Background investigations (dependent upon the length of employment of the employee) may include a combination of the following:

ATMS

BSO CAD

BSO Records

BSO Warrants

CCIS

Credit Card (Equifax)

e-Agent

D.A.V.I.D.

FDPR

Florida Conceal Weapons Permit

Interpol

Juvenile Justice Info System

Military History

National Decertification Database

Odyssey

Selective Service Verification

Some files selected reflected staff that was hired 25+ years ago; the background process, including specific background software utilized has changed during the past

three decades. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 Broward Sheriff's Office makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. The agency has fourteen Background Investigators. A review of Human Resource files illustrated this practice. Two applicants had previously worked at a prior institution; both times, the Background Investigator had sent and received the prior documentation from the previous employer. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) Broward Sheriff's Office requires a criminal background record check to be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Four out of four WellPath and Trinity files reviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) Broward Sheriff's Office completes background checks every 5 years. There is an extensive tracking system in place to monitor the process. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) outlines the requirements. The last 5-year background checks (1,429 NCIC Checks) were completed in April 2021. The agency has enrolled in the NCIC program - RapBack. This program alerts BCSO administrators if any employee has been arrested when his/her fingerprints are submitted to the FBI. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Broward Sheriff's Office instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. Each subsequent year of employment, employees are required to sign the agency's Policy Manual. Page three of the Sheriff's Policy Manual informs staff they are under BCSO colors while not on duty; specifically, when working for another employer. File review showed that twenty out of twenty files contained a signed acknowledgment of this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. The PREA Coordinator stated there have not been any terminations of a

	contract employee for this circumstance in the past twelve months at the Main Jail. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The PREA Coordinator stated that he was not aware any such a request in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon the auditor's observation during the tour, a review of the Mail Jail physical plant, Policy 11.1 Prison Rape Elimination Act (PREA), 2021-2022 Budget Information, PREA Manager interview, and a review of documentation provided; the following delineates the audit findings regarding this standard: 115.18 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. The PREA Manager advised the agency has not expanded or made significant modifications to the Mail Jail this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.18 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. The PREA Manager advised the agency has not expanded or made significant modifications either in technology upgrades or physical plant design to the Mail Jail this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 17-20), a review of the Memorandum of Understanding with the Nancy J. Cotterman Center, investigative staff interviews, PREA Coordinator interview, review of fifteen PREA investigation files, random staff interviews, and a review of documentation provided; this delineates the audit findings regarding this standard: 115.21 (a) and (b) Broward Sheriff's Office complies with all elements of this standard. Documented in Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20); the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. Broward Sheriff's Office conducts its own PREA criminal investigations. The Broward County Sheriff's Office investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the Broward County Sheriff's Office Bureau of Investigations and Projects Unit investigators on each case. This was confirmed during an interview with the PREA Coordinator. During the investigation file review, a PREA checklist is maintained for all sexual abuse allegations; the checklist serves as a reminder to complete each step in the investigative process. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The fifteen files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (c) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (expires in 2025) without financial cost to the inmate, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. During the past twelve months, the PREA Coordinated state the Mail Jail has not had a PREA allegation requiring a SANE/SAFE exam. An interview with the PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (d) The Broward Sheriff's Office has entered into a Memorandum of

	Understanding with Nancy J. Cotterman Center (NJCC) (expires in 2025) which agrees to provide outside victim advocacy services to the inmates. The services of these victim advocates have not been requested or used by the inmates during this audit cycle. The agency also provides inmates with mental health services through their contracted health services provider WellPath. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (e) Broward Sheriff's Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (expires in 2025); which agrees to provide outside victim advocacy services to the inmates upon request. Interviews with multiple Mail Jail staff members confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (f) The Broward Sheriff's Office is responsible for administrative investigations and criminal investigators with the Broward County Sheriff's Office shall conduct all criminal investigations covering all aspects of this standard. Broward Sheriff's Office conducts its own PREA criminal investigations. This was confirmed during an interview with the PREA Coordinator and the review of all PREA investigation files from the past twelve months. During the past twelve months, there were sixteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and ten sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the sixteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, this part of the standard does not apply to this facility. 115.21 (g) The Mail Jail Facility is exempt from this section due to the fact that the agency conducts its own PREA criminal investigations. 115.21 (h) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (expires 2025) without financial cost to the inmate, where evidentiary or medically appropriate. Nancy J. Cotterman Center (NJCC) also supplies victim advocates upon request for the victims of sexual abuse. The agency also provides inmates with mental health services through their contracted health services provider WellPath. This was confirmed during interviews with the PREA Coordinator and two contracted medical health staff members. Therefore, this part of the standard is not applicable to this facility.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 19-21) investigative staff interviews, and a review of documentation provided; the following delineates the audit findings regarding this standard: 115.22 (a) The Broward Sheriff's Office is required to investigate all PREA complaints received at this facility. Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). All potential criminal activity is referred to the Broward County Sheriff's Office PREA Investigator assigned to the Mail Jail. During the past twelve months, the Mail Jail has received a total of: 6 sexual abuse allegations (all were unfounded or unsubstantiated) 9 sexual harassment allegations (all were unfounded or unsubstantiated) There were no cases of sexual abuse referred for criminal prosecution during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (b) All PREA allegations are investigated by the Broward Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Broward County Sheriff's Office PREA Investigators for criminal investigation and prosecution as warranted. This was confirmed during an interview with the agency-wide PREA Coordinator. This policy is published (English and Spanish) on the agency's website as required. https://www.sheriff.org/DOD/Documents/Prison%20Rape%20Elimination%20Act.pdf Reporting methods include: Call Broward Sheriff's Office PREA Hotline (954) 831-3775 Report to any staff, volunteer, contractor, or medical/mental health staff Call the Nancy J. Cotterman Center (954) 761-7273 Write a Letter to the Nancy J. Cotterman Center

	400 N.E. 4th Street Fort Lauderdale, FL 33301 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (c) The Broward Sheriff's Office refers all criminal allegations for the investigation to the designated Broward County Sheriff's Office PREA investigators. This was confirmed during an interview with the agency-wide PREA Coordinator. The requirements of this part of the standard are outlined in the policy that is posted on the website as required. https://www.sheriff.org/DOD/Documents/Prison%20Rape%20Elimination%20Act.pdf Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31	**Employee training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the review of 05-10-01 BSO SOP, the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) staff interviews, Mail Jail's random staff training file review, and review of documentation provided by the National PREA Resource Center's 44-slide PowerPoint- The Prison Rape Elimination Act: Overview of the Law and Your Role, BSO- Security PREA Training, Medical, and Civilian Security Orientation Training, sign-in sheets, twenty signed acknowledgment forms, training curriculums, and employee handouts); the following delineates the audit findings regarding this standard: 115.31 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) requires Broward Sheriff's Office to train all their employees who have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' right to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual

	abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Fifteen random staff interviews confirmed staff are being trained. All interviewed staff have a working knowledge of the agency's zero-tolerance policy against sexual harassment and sexual abuse; as well as, how to detect and respond to such allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (b) The training is tailored to both the male and female gender of the inmates at Broward Sheriff's Office. This is done because staff may be reassigned to a different Broward County facility. This was confirmed after reviewing the training lesson plan and PowerPoint (the National PREA Resource Center's 44-slide PowerPoint-The Prison Rape Elimination Act: Overview of the Law and Your Role) and an interview with the training staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. The training staff provides training to each of the four Broward County Sheriff's Office facilities. All Mail Jail staff receive annual refresher PREA training during in-service according to SOP 11.1 which meets the requirements of this standard. Staff also received annual PREA training through roll call training. A review of twenty employee training files illustrated that all ten were found to be in compliance with the policy. Therefore, the facility meets this part of the standard during this audit. 115.31 (d) Broward Sheriff's Office documents, through employee examination on Broward County PREA Policy, demonstrating all employees understand the training they have received. Twenty out of twenty training file reviews confirmed this practice. Therefore, the facility demonstrated compliance with this part of the

	standard during this audit.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) eight agency-wide volunteers and ten agency-wide contractor interviews, random training file review, and review of documentation provided Broward County Civilian Security PREA Orientation Packet, sign-in sheets, signed acknowledgment forms, training curriculums, and handouts; the following delineates the audit findings regarding this standard: 115.32 (a) Broward Sheriff's Office ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Broward Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Broward County PREA Overview –The Facilitator's Guide outlines the training given to all volunteers and contractors. Interviews with eight agency-wide volunteers and ten agency -wide contract employees confirmed they had been properly trained. Signature on the Broward County PREA Policy Acknowledgment and/or Broward County Sheriff's Office Training Roster acknowledges each volunteer and contractor has received and understands the PREA training provided. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (b) Broward County Civilian Security PREA Orientation Packet pages 26-34 reviews the level and type of training provided to volunteers and contractors based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Broward County's zero-tolerance policy regarding sexual abuse and sexual harassment and their requirements to report such incidents. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (c) Broward Sheriff's Office documents through signature on the Broward Training Roster, that volunteers and contractors understand the training they have received. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, PREA Education Cards, and the PREA video; as well as interviews with the Mail Jail PREA Manager, random inmates, and staff. The following delineates the audit findings regarding this standard: 115.33 (a) During the intake process, inmates receive information explaining Broward Sheriff's Office's zero-tolerance policy (Broward County Policy 11.1 Prison Rape Elimination Act (PREA)) regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates sign the Orientation Checklist that they have received the Preventing Sexual Abuse Brochure which is available in English, Creole, and Spanish. All inmates are booked at the Main Jail and complete the orientation process before being placed in another BCSO Facility. All inmates receive a PREA Education Card during the intake process. Cards are available in English, Spanish, and Creole. All PREA Managers are made aware of new inmates arriving at their respective facilities. Some inmates did not remember received PREA information during the booking process. The auditor requested and reviewed ten separate video feeds from the booking area; each video feed clearly showed the inmate receiving the PREA information and walking around the booking area with the Card in their possession. All inmates had signed the facility property receipt indicating they had received the Inmate Handbook (PREA information enclosed). The PREA Manager ensures all new arrivals at their respective facility are reassessed. This was confirmed during an interview with the Classification Staff. During the onsite portion of the audit, the auditor: - confirmed who is responsible for conducting the intake process. - tested how the facility provides the necessary PREA information to all confined persons, regardless of ability and language, including whether: 1. Written information was clear and provided at an appropriate reading level and was accessible for all persons confined in the facility, including those who are limited English proficient (LEP) 2. The facility provided interpreters when needed, to assist deaf, hard of hearing, and non-English speaking persons confined in the facility 3. Staff are prepared to read written information out loud, if applicable, to make accommodations for persons confined in the facility when necessary 4. Mental health staff or other skilled educators/staff were involved in providing the required information to confined persons with cognitive or functional disabilities as needed.

	Auditor Recommendations: Add the PREA Card to the Facility Property Receipt Add signature pad technology for the Facility Property Receipt Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit. 115.33 (b) Within 30 days of intake, Broward Sheriff's Office provides comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The additional education is provided in the form of a video (both English and Spanish). The video "PREA- What you need to know" was created by the PREA Resource Center and Just Detention International. This practice is outlined in the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8). All inmates are booked at the Main Jail and complete the orientation process before being placed in another BCSO Facility. All PREA Managers are made aware of new inmates arriving at their respective facilities. The PREA Manager ensures all new arrivals at their respective facility are reassessed. There were several inmates who did not remember if they had watched the PREA orientation video utilized for the more in-depth training. The auditor did reinterview a Classification Supervisor, tested the video system and conducted informal interviews with current pre-class inmates to ensure the video was working properly. Individual inmate contact cards in the jail management system did show all ten inmates had signed a form acknowledging they had watched the video. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Turing the onsite portion of the audit, the auditor tested and accessed: - The facility's process for securing interpretation services on-demand. - How the facility provides the necessary PREA information to all confined persons, regardless of ability and language. - The ability of interpretation services. - The accessibility of interpretation services. Auditor Recommendations: -Work with kiosk/tablet vendor to add a required acknowledgment on the kiosks/ tablets with subsequent reports There were no other concerns noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides such education within one year of the effective date of the PREA standards to all its inmates and provides education to inmates upon transfer as required by this standard. This was confirmed during an interview with the Mail Jail PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with Language Line Services. The agency provided invoices showing the utilization of the service. PREA handouts, PREA postings, PREA education video, PREA Education Cards and the Inmate Handbook are provided in English, Creole, and Spanish. The facility also makes available a TDD phone at each of the four facilities. There was no blind/low vision and one deaf/hard of hearing inmate, three with physical impairments, and six with cognitive impairments incarcerated at the time of the onsite visit. All inmates were generally able to understand the auditor during the interview, and displayed a knowledge of the agency's zero-tolerance against sexual abuse and sexual harassment and were able to list the internal and external modes of reporting. Two limited English proficient inmates had documentation in their intake file showing they all had received a PREA Brochure, properly screened, and watched the PREA education video. Both LEP inmates stated they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was documentation provided of inmates' participation in PREA educational sessions as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) Mail Jail does provide the inmates with posters, pamphlets, and an inmate handbook in English, Creole, and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates/detainees are given the "Broward County PREA – Prevention, Detections, and Response Brochure". The agency has "Zero Tolerance" Posters located in all common areas of the facility. Records review showed that two out of two LEP inmates received education information in a Spanish or Creole format; both LEP inmates stated they felt safe in the Mail Jail Facility. During the onsite portion of the audit, the auditor observed

- whether signage throughout the facility can be easily read/accessed by persons

	in the facility - signage is provided in English and translated for the other languages (Spanish and Creole) most commonly spoken in the facility. - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34	**Specialized training: Investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices as well as, Policy 11.1 Prison Rape Elimination Act (PREA) page 7, The Moss Group Specialized PREA Investigator Training, National Institute of Corrections Specialized PREA Training, Investigators' training file review, and three BCSO Agency investigative staff interviews, review of fifteen PREA investigation files; the following delineates the audit findings regarding this standard: 115.34 (a) In addition to the general training provided to all employees Broward Sheriff's Office ensures that the PREA Administrative Investigators receive training in conducting investigations in confinement settings. The agency's PREA investigators are a specialized unit, not attached to a specific facility, and are responsible for conducting all PREA investigations at all four BCSO facilities. This was confirmed during a review of the Investigation's training records. The Broward County Sheriff's Office conducts all PREA criminal investigations. Investigators have specialized training for sexual assault in a confinement setting provided by the Moss Group and the National Institute of Corrections. The agency provided the auditor with all requested specialized training certificates. The Investigators have over three decades of experience each and have attended countless trainings pertaining to their job duties. All three investigators interviewed displayed a clear understanding of the

	training they had received. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The Investigators have over three decades of experience and have attended countless trainings pertaining to their job duties. All three investigators interviewed displayed a clear understanding of the training they had received. The agency provided the auditor with all requested specialized training certificates. Review of fifteen PREA investigation files confirmed this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (c) Broward Sheriff's Office maintains documentation that Broward County Sheriff's Office investigators have completed the required specialized training in conducting sexual abuse investigations. Investigators have specialized training for sexual assault in a confinement setting provided by the Moss Group and the National Institute of Corrections. The agency provided the auditor with all requested specialized training certificates. Broward County Sheriff's Office requires investigators to have specialized training for sexual assault in a confinement setting. The auditor found the facility PREA Investigators to be very knowledgeable and well versed in the PREA standards as they pertain to investigations and evidentially standards. All three investigators interviewed displayed a clear understanding of the training they had received. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices, as well as five PREA Specialized Medical/Mental Health training records, five WellPath training file review, and medical and mental health staff and PREA Coordinator interviews; the following delineates the audit findings regarding this standard: 115.35 (a) Broward County provides PREA Specialized Medical/Mental Health training video, curriculum provided, training file Broward Sheriff's Office review and staff interviews revealed the agency has provided specialized training to all its medical

	and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. A review of five training records and interviews with two WellPath Medical Staff members confirmed this practice. Mail Jail has specific contracted medical and mental health staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (b) The medical staff at this facility does not conduct forensic exams. This was confirmed during interviews with the Medical Staff and the PREA Coordinator. Broward Sheriff's Office has a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) for SANE/SAFE examinations. Therefore, this part of the standard is not applicable to this facility. 115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. The training is an online course entitled; PREA Specialty Training for medical and mental health staff. A review of five contracted medical and mental health training records and interviews with two agency-wide WellPath staff members assigned to the Mail Jail confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (d) Medical and mental health care practitioners at Mail Jail also receive the annual training mandated for all employees, contractors, and volunteers. A review of five training records and interviews with two WellPath staff members assigned to the Mail Jail confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41	**Screening for risk of victimization and abusiveness**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-11), inmate and staff interviews, inmate file reviews, Operations Order CL-21, auditor observations, Classification Supervisor interview, PREA Coordinator interview, and a review of the Broward Sheriff's Office Sexual Abuse Screening Tool 11.1B; the following delineates the audit findings regarding this standard:

115.41 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. All new inmates are booked at the Main Jail and receive orientation before being assigned to another BCSO facility. Random inmate interviews confirmed this practice. Inmates sign a facility property receipt, indicating they have received the facility's brochure on PREA during booking. The information is available in English, Spanish, and Creole. Several inmates interviewed stated they did not remember receiving a PREA brochure upon intake. The review of their intake files showed where each had signed for the brochure as a facility-issued item. The auditor asked, received and reviewed ten separate video recordings in the booking area. Each recording clearly showed inmates receiving the PREA Card in the booking area. The PREA Card outlines basic information on the topics of sexual assault and sexual harassment, the agency's zero tolerance, reporting procedures, and the victim advocacy support available. During the onsite our, the auditor:

- confirmed who completes the risk screening

- assessed whether the screening process occurs in a setting that ensures as much privacy as possible

- assessed whether screening staff ask screening questions in a manner that fosters comfort and elicits responses

- tested the method of assessing confined persons for risk of being sexually abused by other inmates confined in the facility

Auditor Recommendations:

- Add the PREA Card on the Facility Property Receipt.

- Add electronic signature pads to the jail management system.

No other issues were noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) The Broward Sheriff's Office provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. screening and orientation are completed at the Mail Jail; where all new inmates are booked in the Broward County Sheriff's Office system, ensuring consistency with agency policy and PREA compliance. This process is documented on (the Broward County) Assessment Questionnaire Form. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30

	days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (c) Based on the documentation provided and inmate file reviews the agency utilizes an objective screening instrument that covers all aspects of this standard. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (d) The intake screening instrument (Broward County) Sexual Abuse Screening Tool considers, 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; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Broward Sheriff's Office Assessment Questionnaire Form. All initial screenings are completed at the Mail Jail and reassessments are completed at the appropriate housing facility. This was confirmed during an interview with a

	Classification Supervisor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates within 30 days from the inmate's arrival, the Broward Sheriff's Office will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Broward Sheriff's Office since the intake screening. The Classification Staff completes a follow-up interview with each inmate within 30 days to determine if additional information is available. All initial screenings are completed at the Mail Jail and reassessments are completed at the appropriate housing facility. This process is documented on the Broward Sheriff's Office Assessment Questionnaire Form. Twenty out of twenty Classification files confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. A review of rescreening showed there was a clear handoff from the PREA Manager and the Screening Staff when circumstances warranted a reassessment. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office does not discipline inmates for refusing to answer screening questions or not disclosing complete information. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (i) Broward Sheriff's Office implements appropriate controls on the dissemination 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. Based on policy review, interviews with the PREA Coordinator and the PREA Manager at the Mail Jail, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work, and program assignments. Staff responsible for inmate movements have access to see who is listed as an aggressor and/or a victim; lists are maintained in the agency's Jail Management System. All sex offenders are housed in a segregated unit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 9-11), PREA Manager interview, two targeted inmate and random staff interviews, file review, and a review of the Broward County Assessment Questionnaire Form; the following delineates the audit findings regarding this standard: 115.42 (a) Broward Sheriff's Office uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. This was confirmed during a review of policy and an interview with the Mail Jail PREA Manager. Records review in the agency's JMS was found to be inconsistent with the agency's policy; therefore, requiring corrective action. **Corrective Action:** The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility. **Response to Corrective Action:** A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label. A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell. In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others

The agency has also added new special condition flags for the following individuals:

Speech or cognitive disability
Self identifies as LGBTQ
Limited English Proficient (LEP)

These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM's to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes.

The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy requires Broward Sheriff's Office makes individualized determinations about how to ensure the safety of each inmate. This was confirmed during a review of policy and an interview with the Paul Rein Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstant with the agency's policy; therefore, requiring corrective action.

Corrective Action:

The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility.

Response to Corrective Action:

A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label.

A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor

with a sexual victimization risk in the same cell.

In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others

The agency has also added new special condition flags for the following individuals:

Speech or cognitive disability
Self identifies as LGBTQ
Limited English Proficient (LEP)

These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes.

The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) Broward Sheriff’s Office outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on a case-by-case basis as required by this standard. Based on interviews with the two self-identified LBGTI inmates housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate’s safety when making housing and programming assignments. Initial screening and orientation are completed at the Mail Jail, where all new inmates are processed into the Broward County Sheriff’s Office system. This was confirmed during a review of policy and during an interview with the Main Jail PREA Manager. Mail Jail Staff completes all necessary and/or required PREA reassessments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) documents Broward Sheriff’s Office procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Based on interviews with the two self-reported LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate’s safety when making housing and programming assignments. The inmates also confirmed the PREA Manager always inquired about the inmate’s safety. Documentation provided revealed that a review was conducted and

	documented every six months as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (e) Broward Sheriff's Office requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. Based on interviews with nine self-identified LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety regarding housing assignments. Once a transgender inmate is processed into the Mail Jail, a multi-disciplinary team reviews the inmate's housing, programming, and worker status based on the inmate's own views, medical and mental health history, prior institutional behavior record, and programming needs. The multi-disciplinary team will then make an individualized assessment. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 14) requires that Broward Sheriff's Office transgender and intersex inmates be given the opportunity to shower separately from other inmates. The two self-identified LBGTI inmates confirmed during the interview with this auditor being allowed to shower separately. This was confirmed during informal conversations with random staff. The decision for housing and program placement for a transgender inmate is documented in the Jail Management Software. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) stipulates that Broward Sheriff's Office does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. This was confirmed by the auditor's observation during the onsite visit, interview with two self-identified LBGTI inmates, and discussion with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43	**Protective Custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), two segregation staff interviews, random and twenty-four targeted inmate

	interviews, and documentation review; the following delineates the audit findings regarding this standard: 115.43 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) states that inmates/detainees at high risk for sexual victimization are not placed 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. These policies outline the procedures to ensure compliance with this standard. Two Segregation Staff and twenty-four targeted inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) stipulates that inmates/detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If the Broward Sheriff's Office restricts access to programs, privileges, education, or work opportunities, the Broward Sheriff's Office documents the opportunities that have been limited, the duration of the limitation, and the reasons for such limitations. There were no inmates out of forty that were interviewed that stated they had been placed in involuntary segregation based on their PREA screening status. This was confirmed during interviews with the Main Jail PREA Manager and Mail Jail Segregation Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (c) Broward Sheriff's Office assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. Two Mail Jail Segregation Staff and twenty-four targeted inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51	**Inmate reporting**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on interviews with random and targeted inmates, random staff interviews, auditor observations, Broward County Policy 11.1 Prison Rape Elimination Act (PREA)

(pages 13-15), the Inmate Handbook, PREA Brochures, and posters provided to inmates were utilized to verify compliance with this standard; the following delineates the audit findings regarding this standard:

115.51 (a) Broward Sheriff's Office provides multiple internal ways for inmates to report incidents of abuse or harassment: they include;

· Call Broward Sheriff's Office PREA hotline at (954) 831-3775

· Report to any staff, volunteer, contractor, or medical or mental health staff

· Submit a grievance, inmate request, or a sick call slip

· Report to the PREA Coordinator or PREA Compliance Manager

· Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on the inmate's behalf by calling (954) 831-3775

· Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273)

· Write a letter to Nancy J. Cotterman Center

400 N.E. 4th Street

Fort Lauderdale, FL 33301

Posters are located in each housing unit and all common areas in English, Creole, and Spanish outlining the multiple processes by which inmates can report sexual abuse and/or sexual harassment. The auditor successfully tested the phone system during the facility tour. The auditor did observe that the information was available in English, Spanish, and Creole. During the onsite portion of the audit, the auditor did observe:

- whether signage throughout the facility can be easily read/accessed by persons in the facility

- whether the information on the signage is accurate and consistent throughout the facility

- where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided

The auditor also:

- completed and submitted a test report

- tested the accessibility of reporting procedures

- had informal conversations with staff and inmates regarding reporting methods

- reviewed the inmate mail process
- reviewed the inmate grievance process
- tested the inmate phones
- tested the PREA hotline

No issues were noted. The PREA hotline telephone number is affixed to each of the inmate telephones in the facility. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.51 (b) Broward Sheriff's Office provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Broward Sheriff's Office, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The Broward Sheriff's Office has by Memorandum of Understanding provided the address and phone number for Nancy J. Cotterman Center (NJCC) to the inmates satisfying the requirements of this standard. Inmates have access to this information in multiple locations. The auditor successfully tested the phone system during the facility tour. There were fifteen PREA allegations made in the past twelve months, the source of the allegations were as followed:

Kiosk	5
From another agency	1
Hotline	5
Written note	1
Verbal to BCSO Staff	1
Verbal to Contract Employee	2
Grievance	1

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. All staff, volunteers, and contractors have been trained in the mandatory reporting laws in the State of Florida; all confirmed this practice during interviews. This philosophy was discussed during the review of the agency's PREA investigation files with the agency's PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.51 (d) Mail Jail staff may privately report sexual abuse and sexual harassment to the Broward County Sheriff's Office Internal Affairs Division or the PREA external telephone number. Informational posters are located throughout all facilities including common areas, administration areas, and inmate housing areas. This information includes the telephone number and address of the Nancy J. Cotterman Center (NJCC). Inmates have access to this information in multiple locations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with random and targeted inmates, random staff interviews, auditor observations, Broward County Policy 11.1 Prison Rape Elimination Act (PREA), the Inmate Handbook, PREA Brochures, and posters provided to inmates were utilized to verify compliance with this standard; the following delineates the audit findings regarding this standard: 115.52 (a) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During the past twelve months, Mail Jail has received one filed grievance concerning sexual harassment. File review indicated the grievance was properly investigated and found to be UNFOUNDED. An interview with the PREA Coordinator confirms this process. There were fifteen total PREA allegations made in the past twelve months, the source of the allegations were as followed: Kiosk 5 From another agency 1 Hotline 5 Written note 1 Verbal to BCSO Staff 1 Verbal to Contract Employee 2 Grievance 1

	The agency complies with this section of the standard. 115.52 (b) The Broward County Sheriff's Office does not impose a time limit on when offenders/detainees may submit a grievance regarding an allegation of sexual abuse. An interview with the PREA Coordinator and file review of the one PREA investigations from a grievance confirms this practice. Therefore, the agency complies with this section of the standard. 115.52 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states the agency will ensure that offenders/detainees alleging sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past twelve months, Mail Jail has had one grievance filed concerning sexual harassment and no grievance for sexual abuse. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint. This was confirmed by the PREA Coordinator. Therefore, the agency complies with this section of the standard. 115.52 (d) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require it, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for the reply, including any properly noticed extension, the offenders/detainee complainant may consider the absence of a response to be a denial at this level. During the past twelve months, Mail Jail not had one grievance filed concerning sexual harassment and none alleging sexual abuse. Interview with the PREA Coordinator reiterates this process; therefore, the agency is found to comply with section of the standard. 115.52 (e) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states third parties including fellow offenders/detainees, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision. During the past twelve months, Mail Jail has had one grievance concerning sexual harassment and none concerning sexual abuse. The PREA Coordinator confirmed this process. During the onsite audit, the auditor observed:

	- whether signage throughout the facility can be easily read/accessed by persons in the facility - signage is provided in English and translated into Spanish and Creole - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. - whether kiosks were operational. - the third-party reporting process by personally testing the method provided to the public. Therefore, the agency compiles with this section of the standard. 115.52 (f) The Broward County Sheriff's Office General Order 10.6.002 states when an offender/detainee is subject to a substantial risk of imminent threat of sexual abuse, the offender/detainee may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent potential sexual abuse. Corrective and protective action must be pursued promptly. Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During the past twelve months, Mail Jail has received on sexual harassment grievance concerning sexual harassment and none alleging sexual abuse. An interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.

115.53	**Inmate access to outside confidential support services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practices, the PREA Manager interview, Inmate Handbook (English, Spanish, and Creole), staff interviews, inmate interviews, PREA Posters, Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC), and documentation review; the following delineates the audit findings regarding this standard:

115.53 (a) The agency has entered into a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) which agrees to provide confidential outside victim advocacy services to the inmates at Broward Sheriff's Office. The mailing address and telephone number for this agency are made available to all inmates at the facility. Broward Sheriff's Office enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The auditor successfully tested the phone system. The person who answered the call, took the auditor through the process if an actual inmate had contacted them for assistance. The Sexual Assault representative stated they did utilize the bi-lingual employees if they received a call from a limited English Proficient inmate. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Inmates are given this information upon intake on the Orientation Checklist. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 22-23) and the Inmate Handbook (page 6) outlines this process. During the onsite portion of the audit, the auditor:

- tested access via phones by calling the outside emotional support service provider(s) in the same manner that a person confined in the facility would be expected to call

- assessed whether all persons confined in the facility have regular access to phones to contact the outside emotional support service provider(s), including persons confined in restricted housing, and have reasonable accommodations

- assessed how the facility provides access to phones that are unmonitored or allow for privacy

- assessed the accessibility of writing material and the inmate mail process

There were no deficiencies noted. There were fifteen PREA allegations made in the past twelve months, the source of the allegations were as followed:

Kiosk	5
From another agency	1
Hotline	5
Written note	1
Verbal to BCSO Staff	1
Verbal to Contract Employee	2
Grievance	1

Therefore, the facility demonstrated compliance with this part of the standard during

	this audit. 115.53 (b) Broward Sheriff's Office informs 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. All calls to the Nancy J. Cotterman Center (NJCC) are not recorded. This was confirmed by the PREA Manager. NJCC contact information includes: · Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273) · Write a letter to Nancy J. Cotterman Center 400 N.E. 4th Street Fort Lauderdale, FL 33301 The information is available throughout the facility in poster form. There were fifteen PREA allegations made in the past twelve months, the source of the allegations were as followed: Kiosk 5 From another agency 1 Hotline 5 Written note 1 Verbal to BCSO Staff 1 Verbal to Contract Employee 2 Grievance 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (c) Broward Sheriff's Office maintains a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.54	**Third-party reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on the review of Broward Sheriff's Office practices as well as a review of the agency website outlining third-party reporting; the following delineates the audit findings regarding this standard: 115.54 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 16) mandates that the Mail Jail provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the facility's website at: https://www.sheriff.org. Methods include; mailing a letter to the Sheriff, mailing a letter to Broward County, mailing a letter to the South Florida Center against Sexual Abuse, or calling the facility directly. The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. A review of PREA investigation files revealed that three investigations were started and completed based on third-party reports. During the onsite portion of the audit, the auditor observed: - whether signage throughout the facility can be easily read/accessed by persons in the facility - Signage language is clear and easy to understand - signage is provided in English and translated into Spanish and Creole - the signage text size, formatting, and physical placement accommodate most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc. - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. There were no deficiencies noted. There were fifteen PREA allegations made in the past twelve months, the source of the allegations were as followed: Kiosk 5 From another agency 1 Hotline 5 Written note 1 Verbal to BCSO Staff 1 Verbal to Contract Employee 2 Grievance 1 Therefore, the facility demonstrated compliance with this part of the standard during

	this audit.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages-14-16), Sexual Abuse Incident Check Sheet 14-2C, contracted medical and mental health staff, and the Mail Jail PREA Manager interviews, PREA Checklist, and documentation provided, the following delineates the audit findings regarding this standard: 115.61 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages-14 15), 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, whether or not it is part of Broward Sheriff's Office; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. During the onsite portion of the audit, the auditor: - asked random staff to walk through the staff reporting process - observed whether the staff reporting methods were available - assessed whether staff were required to report to their coworkers or immediate supervisor There were no issues to note. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 16) stipulates that Mail Jail requires apart from reporting to designated supervisors or officials, staff does 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. This was reiterated during an interview with the Mail Jail PREA Manager. During the investigation file review, a PREA checklist is maintained for all sexual abuse allegations; the checklist serves as a reminder to complete each step in the investigative process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.61 (c) Broward Sheriff's Office requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Contracted medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentially, at the initiation of services. This was confirmed during interviews with two WellPath staff; each confirmed their knowledge of mandatory reporting laws in the state of Florida. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 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, the Broward Sheriff's Office reports the allegation to the designated state or local services agency. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (e) Broward Sheriff's Office reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to PREA Investigators as required. During the past twelve months, there were sixteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the sixteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.62	**Agency protection duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, PREA Checklist, and documentation provided; the following delineates the audit findings regarding this standard: 115.62 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15) and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at Mail Jail is subject to a substantial risk of imminent sexual abuse. The review of ten PREA investigation files clearly illustrated that everyone

	from line staff, intermediate supervisors, and the PREA Incident Review Team plays specific roles in dealing with PREA allegations. The Mail Jail Facility maintains an updated “PREA Alerts” list at all times in the jail management system; this list is made available to all staff charged with the duty of housing movements. During the investigation file review, a PREA checklist is maintained for all sexual abuse allegations; the checklist serves as a reminder to complete each step in the investigative process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63	**Reporting to other confinement facilities**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), Mail Jail PREA Manager and three PREA Investigator interviews, and notification documentation provided; the following delineates the audit findings regarding this standard: 115.63 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Broward Sheriff’s Office that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. This process is documented in a memorandum. This process was corroborated during interviews with the Main Jail PREA Manager and the three PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. A documentation review revealed that two such notifications have occurred during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Broward Sheriff’s Office; the allegation is referred immediately to PREA Investigators to be investigated. This was confirmed during interviews with the PREA Coordinator and the three PREA Investigators. The PREA Investigators stated they have received one notification from another agency in

	the past twelve months. The allegation was investigated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 17-19), fifteen random staff interviews, Medical/Mental Health Interviews, PREA Checklist, and documentation provided; the following delineates the audit findings regarding this standard: 115.64 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. This was confirmed during interviews with fifteen random staff and two medical staff members. Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit. 115.64 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of two contract employees. All random staff interviews confirmed staff is trained in their role and responsibility a first responders. Two first responders were also interviewed at Mail Jail; it was clear each understands the process as it is outlined in Broward County Sheriff's Office 11.1

	PREA policy. During the investigation file review, a PREA checklist is maintained for all sexual abuse allegations; the checklist serves as a reminder to complete each step in the investigative process. During the past twelve months, there were sixteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the sixteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.65	**Coordinated response**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) page 19, staff interviews, PREA Response Booklet, and documentation provided, the following delineates the audit findings regarding this standard: 115.65 (a) Broward Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 19) has a very comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, contracted medical and mental health practitioners, designated agency PREA investigators, PREA Coordinator, Mail Jail PREA Manager, and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with multiple Incident Review Team members confirmed their knowledge of the response plan. Interviews with line staff and supervisory staff indicated all potential staff first responders have a clear understanding in their role when PREA allegations are made. During the investigation file review, a PREA checklist is maintained for all sexual abuse allegations; the checklist serves as a reminder to complete each step in the investigative process. Each workstation in the facility has a PREA Response Booklet, the booklets cover the major components of the agency's PREA policy and response procedures. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.66	**Preservation of ability to protect inmates from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), interviews with the facility leadership, and the PREA Coordinator, collective bargaining agreement, and documentation provided; the following delineates the audit findings regarding this standard: 115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Broward Sheriff's Office policies on sexual abuse and sexual harassment. The Broward Sheriff's Office has not entered into any collective bargaining agreements during this audit cycle. This was confirmed during an interview with the facility leadership and PREA Coordinator. The Federation of Public Employees – A Division of the National Federation of Public and Private Employees (AFL-CE0) agreement has specific language outlining the disciplinary sanctions for members involved with PREA incidents. Nothing in the agreement restricts the agency in the following two area: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76; (2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Therefore, the agency demonstrated compliance with this part of the standard during this audit.

115.67	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 21-22), staff interviews, inmate interviews, Retaliation Monitor interview, PREA Retaliation Monitoring form, and documentation provided; the following delineates the audit findings regarding this standard: 115.67 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) policy to protect all inmates and staff at Mail Jail who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and designates which staff members or departments are charged with monitoring retaliation. Monitoring is documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with

	the designated Retaliation Monitor. The PREA Manager at the Mail Jail is also the Retaliation Monitor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (b) Broward Sheriff's Office has multiple protection measures, such as housing changes or transfers for inmates, victims, or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Mail Jail PREA Manager is the designated Retaliation Monitor for the Mail Jail Facility. Monitoring is documented on the PREA Retaliation Monitoring Report. Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit. 115.67 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) calls for at least 90 days following a report of sexual abuse, Broward Sheriff's Office monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. The Mail Jail Retaliation Monitor monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates an ongoing need. Monitoring is documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with the designated Retaliation Monitor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (d), (e), (f) If any other individual who cooperates with an investigation expresses a fear of retaliation, Mail Jail takes appropriate measures to protect that individual against retaliation. The Mail Jail PREA Manager is the designated Retaliation Monitor for the Mail Jail Facility. Broward County's obligation to monitor shall terminate if the inmate is released from custody. This was confirmed during an interview with the designated Retaliation Monitor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.68	**Post-allegation protective custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), segregation staff interviews, Mail Jail PREA Manager and agency wide PREA Coordinator interviews, inmate interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.68 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12) states that Broward Sheriff's Office prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the Mail Jail PREA Manager and the Mail Jail segregation staff revealed that involuntary segregation has not been used for this purpose in the past twelve months at Mail Jail. This was also confirmed during an interview with the agency wide PREA Coordinator. The Mail Jail PREA Manager stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71	**Criminal and administrative agency investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), Broward County Records Retention Schedule, investigative staff interviews, training certificates, fifteen investigative reports, Collective Bargaining Agreement, Florida State Statute 112.532 (Law Enforcement and Corrections Officer Bill of Rights, as well as interviews with the PREA Investigators, Internal Affairs Investigators, PREA Coordinator, and the PREA Compliance Managers, the following delineates the audit findings regarding this standard: 115.71 (a) Broward County Sheriff's Office PREA investigators conduct an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. Broward Sheriff's Office has a multiple-layered investigation approach for Staff-on-Inmate Sexual Abuse allegations as a result of Florida State Statute 112.532, which states "the contents of the complaint and investigation shall remain confidential until such time as the employing law enforcement agency makes a final determination whether or not to issue a notice of disciplinary action consisting of suspension with a loss of pay, demotion, or dismissal. Due to the state of emergency declared by the Governor of the State of Florida, Internal Affairs cannot compel staff to be interviewed for internal affairs investigation. If an allegation of sexual abuse by staff-on-inmate is made, the potential criminal component takes priority, the allegation will immediately be forwarded to the Sex Crimes Unit, then Internal Affairs, and then back to the agency PREA Investigator for final review. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail.

There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (b) Based on training curriculums provided, PREA investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Training records indicated that all Sex Crimes Detectives, all Internal Affairs Investigators, all PREA Managers, and all PREA Investigators have specialized training. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Broward County Sheriff’s Office PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. A review of fifteen PREA investigation files from the Main Jail indicated the agency's policy for investigating PREA allegations was followed by the assigned investigators. This was confirmed during three interviews with three agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) stipulates, when the quality of evidence appears to support a criminal prosecution, Broward Sheriff’s Office refers the case to the Broward County Sheriff’s Office Criminal Investigations Division for the criminal investigation. This was confirmed during three interviews with three agency PREA investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed

	each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as an inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. This was confirmed during interviews with three agency PREA investigators. During the past twelve months, there were fifteenPREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (f) Broward Sheriff's Office administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. This was confirmed during interviews with three agency PREA investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (g) Broward Sheriff's Office criminal investigations are documented by the Broward County Sheriff's Office Criminal Investigations Division in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. A review of ten PREA investigation files from the Main Jail indicated the agency's policy for investigating PREA allegations was followed by the assigned investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to

	be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (h) The Broward Sheriff's Office refers all allegations to the Broward County Sheriff's Office Criminal Investigations Division for investigation and prosecution when warranted. This was confirmed in the investigation file review and during interviews with three agency PREA investigators. A review of ten PREA investigation files from the Main Jail indicated the agency's policy for investigating PREA allegations was followed by the assigned investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (i) The Broward Sheriff's Office retains all written reports for as long as the alleged abuser is incarcerated or employed by the Broward Sheriff's Office, plus five years. This is stipulated in the Broward County Records Retention Schedule. All investigation files are electronically stored with limited administrative access. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (j) The departure of the alleged abuser or victim from employment or control of the Broward Sheriff's Office or agency does not provide a basis for terminating an investigation. This was confirmed during interviews with three agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (k) The Broward County Sheriff's Office Criminal Investigator conducts criminal sexual abuse investigations pursuant to the requirements of this standard. This was confirmed during interviews with three agency PREA investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the

	investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (l) Broward Sheriff's Office refers all criminal cases to the Broward County Sheriff's Office Criminal Investigator and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the Broward County Sheriff's Office Criminal Investigator and the Mail Jail Command Staff. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.72	**Evidentiary standard for administrative investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) and three PREA investigative staff interviews; the following delineates the audit findings regarding this standard: 115.72 Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) states the Broward Sheriff's Office imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. This was reiterated during interviews with three PREA investigators. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73	**Reporting to inmates**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), Inmate Close Out Letter, Inmate Notification Forms, provided, and staff interviews; the following delineates the audit findings regarding this standard:

115.73 (a) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office PREA Investigation Close-Out Memorandum and an Inmate Notification Form. Two examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Broward County Sheriff's Office, in order to inform the inmate as required by this standard. Broward Sheriff's Office outlines the requirements of the criminal investigation and complies with all aspects of this standard. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Broward Sheriff's Office practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

(1) The staff member is no longer posted within the inmate's unit;

(2) The staff member is no longer employed at the facility;

(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Broward Sheriff's Office; or

(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Broward Sheriff's Office

The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office PREA Close-Out memorandum and the Inmate Notification Form. Two examples were reviewed by the auditor. During the past twelve

	months, there were sixteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and ten sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the sixteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (d) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22), following an inmate's allegation they had been sexually abused by another inmate, Broward Sheriff's Office subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or Mail Jail staff learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office PREA Close-Out Memorandum signed by the Mail Jail PREA Manager and the PREA Coordinator along with an Inmate Notification Form. Two examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (e) All such notifications or attempted notifications are documented on the Broward Sheriff's Office PREA Close-Out Memorandum and an Inmate Notification Form. Two examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22) outlines the agency's obligation to report under this standard terminates if the inmate is released from Broward Sheriff's Office's custody. Policy requirements were confirmed during interviews with three agency PREA investigators. Therefore, the Mail Jail demonstrated compliance with this part of the standard during this audit.

115.76	**Disciplinary sanctions for staff**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), documentation provided, and PREA Coordinator interview; the following delineates the audit findings regarding this standard.

	115.76 (a) and (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) stipulates that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.76 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that 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 PREA Coordinator advised there had not been a staff member receiving any type of discipline at the Mail Jail due to a PREA investigation in the past twelve months. Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit. 115.76 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) mandates that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement unless the activity was clearly not criminal, and to any relevant licensing bodies. The PREA Coordinator advised there had not been a staff member receiving any type of discipline at the Mail Jail due to a PREA investigation in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77	**Corrective action for contractors and volunteers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), the documentation provided, facility leadership, and PREA Coordinator interviews; the following delineates the audit findings regarding this standard. 115.77 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24)

	states any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement unless the activity was clearly not criminal, and to relevant licensing bodies. During the past twelve months, there have not been any PREA incidents at the Mail Jail Facility involving a contractor or volunteer. This was confirmed by the PREA Coordinator and the Main Jail Leadership. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.77 (b) Broward Sheriff's Office takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During the past twelve months, there have not been any PREA incidents at the Mail Jail Facility involving a contractor or volunteer. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 24-25), the documentation provided, Facility Leadership, contracted mental health staff, and Mail Jail PREA Manager interviews; the following delineates the audit findings regarding this standard: 115.78 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), policy states that inmates/detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse (detainee on detainee) or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's or detainee's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. This was confirmed during interviews with Facility Leadership and the Main Jail PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.78 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that the disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. This was confirmed during interviews with contracted mental health staff and the Mail Jail PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (d) The contracted mental health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Broward Sheriff's Office does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. This was confirmed during interviews with the PREA Manager and contracted mental health staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (e) Broward Sheriff's Office disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (f) Policy 11. 1 Prison Rape Elimination Act (page 25), states 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. This was confirmed during interviews with Facility Leadership and the Mail Jail PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (g) Broward Sheriff's Office prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed during interviews with Facility Leadership and the PREA Manager. Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit.

115.81	**Medical and mental health screenings; history of sexual abuse**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on review of fifteen PREA investigation files, contracted medical and mental health staff interviews, contract monitor interview, HCD-100 F-06 Policy page 5, Florida Juvenile Consent Law, and medical documentation provided; the following delineates the audit findings regarding this standard: 115.81 (a) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (b) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (c) HCD-100 F-06 Policy page 5 and SOP 11.1 page 10 mandates if the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Broward Sheriff's Office ensures the mate is offered a follow-up meeting with contracted mental health staff within 14 days of the intake screening as required by this part of the standard. The Classification Staff shall document the referral to the (page 22), WellPath Mental Health Staff. A medical records review produced two such referrals. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (d) HCD-100 F-06 Policy page 6 requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other Mail Jail staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. This was confirmed during an interview with two contracted medical staff members and during an interview with the agency's contract monitor. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (e) Broward Sheriff's Office requires WellPath Medical and Mental Health Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility unless the inmate is under the

	age of 18. This was confirmed during an interview with the two WellPath Staff. During the past twelve months, there has not been a situation where consent from an inmate under the age of 18 has occurred. The Florida Juvenile Consent Law addresses this issue. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 23), Memorandum of Understanding with Nancy J. Cotterman Center (NJCC), and medical documentation provided; the following delineates the audit findings regarding this standard: 115.82 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 23), states that Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) to treat inmate victims of sexual abuse. The facility also has medical and mental health staff at the facility ensuring inmates 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. This was confirmed during interviews with two contract medical and mental health staff. Medical documentation was maintained in the PREA investigations files. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (b) Broward Sheriff's Office has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. Victims will be assessed by Nancy J. Cotterman Center staff (NJCC). This was confirmed during WellPath medical and mental health staff interviews.

	Therefore, Mail Jail demonstrated compliance with this part of the standard during this audit. 115.82 (c) Broward Sheriff's Office ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. This is done in cooperation with the Nancy J. Cotterman Center (NJCC) and Central Florida Center against Sexual Abuse. This was confirmed during WellPath medical and mental health staff interviews. Medical documentation was maintained in the PREA investigations files. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (d) Broward County Policy 11.1 Prison Rape Elimination Act (page 23), states that Broward Sheriff's Office requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Broward County Sheriff's Office bears all costs. Medical documentation was maintained in the PREA investigations files. This was confirmed during WellPath medical and mental health staff interviews. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the Main Jail demonstrated compliance with this part of the standard during this audit.

115.83	**Ongoing medical and mental health care for sexual abuse victims and abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, HCD-100 F-06 Policy,

	Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, and medical documentation provided; the following delineates the audit findings regarding this standard: 115.83 (a) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office to offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. This was confirmed during an interview with the two WellPath medical staff. Medical documentation was maintained in the PREA investigations files. During the past twelve months, there were fifteen PREA allegations investigated at the Mail Jail. There were six sexual assault allegations and nine sexual harassment allegations. None of the sexual abuse allegations required a SANE or SAFE exam. The lead auditor reviewed each of the fifteen investigation files. The files were found to be well organized, with detailed descriptions of the evidence, witness statements, photos, and a narrative describing the reasoning behind the findings of the investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (b) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office that the evaluations 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. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath medical staff. Medical documentation was maintained in the PREA investigations files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (c) Broward Sheriff's Office requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Staff and the PREA Manager for the Mail Jail. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (d and e) Based HCD-100 F-06 Policy, SOP 11.0 page 23 and Broward Sheriff's Office documentation requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. Follow-up care is done in cooperation

	between the Nancy J. Cotterman Center (NJCC), and the Broward County Sheriff's Office. This was confirmed during interviews with two WellPath Medical Staff. Medical documentation was maintained in the PREA investigations files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (f) Broward Sheriff's Office requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with two WellPath Medical Staff assigned to the Main Jail. Medical documentation was maintained in the PREA investigations files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (g) Broward Sheriff's Office SOP 11.1 page 24 requires that medical and mental health staff provide treatment services to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Medical and Mental Health Staff. Medical documentation was maintained in the PREA investigations files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (h) The Mail Jail operated by the Broward County Sheriff's Office is a jail and not a prison. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86	**Sexual abuse incident reviews**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Managers, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, the Sexual Abuse or Assault Incident Review Form, Incident Tracking Log, and documentation provided; the following delineates the audit findings regarding this standard:

	115.86 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that Broward Sheriff's Office conducts a sexual abuse incident review after every sexual abuse investigation, including where the allegation has not been substantiated unless the allegation has been determined to be unfounded. This was confirmed during file review and during interviews with the Incident Review Team. The review is documented in the PREA Incident Review Form. There were four PREA Incident Reviews completed in the past twelve months. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (b) Broward Sheriff's Office ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the PREA Incident Review form. This was confirmed during an interview with the PREA Manager. There were four PREA Incident Reviews completed in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (c) The review team consists of upper-level management officials, with input from line supervisors, PREA investigators, all PREA Managers, the PREA Coordinator, and contracted medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit. Attendees sign the PREA Incident Review form. This was confirmed by the PREA Coordinator and the Mail Jal PREA Manager. There were four PREA Incident Reviews completed in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (d) The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in Broward Sheriff's Office where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. The agency has deployed an excellent PREA after-action review form which addresses all elements of the standard. There were four PREA Incident Reviews completed in the past twelve months. Therefore, this meets this portion of the standard. 115.86 (e) Broward Sheriff's Office shall implement the recommendations for improvement or shall document its reasons for not doing so. Each of the four 30-day

	reviews clearly marked recommendations as deemed appropriate by the Incident Review Team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, 2022 PREA Case Register spreadsheet, the agency's website, Survey of Sexual Victimization 2022 SSV-3 Form (US Department of Justice Survey), Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.87 (a), (b) and (c) Broward Sheriff's Office 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 aggregates the incident-based sexual abuse data at least annually. A review of the 2022 PREA Case Register spreadsheet clearly illustrates the statistical analysis the Broward County Sheriff's Office maintains with regard to PREA allegations, investigations, and outcomes.Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that the incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The Broward County Sheriff's Office did submit a Survey of Sexual Violence to the Department of Justice in 2022. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) stipulates the Broward Sheriff's Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. A review of the 2022 PREA Case Register spreadsheet clearly illustrates the statistical analysis the Broward County Sheriff's Office maintains with regard to PREA allegations, investigations, and outcomes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (e) Broward Sheriff's Office does not contract its inmates to other facilities.

	Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (f) Upon request, Broward Sheriff's Office provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. The Broward County Sheriff's Office did submit a Survey of Sexual Violence to the Department of Justice in 2022. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88	**Data review for corrective action**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the 2022 Broward County Annual PREA Report, interviews with the PREA Coordinator, the PREA Managers, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.88 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) specifies that Broward Sheriff's Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Broward Sheriff's Office as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (b) Such reports include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the Broward Sheriff's Office's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (c) Broward Sheriff's Office's collective report is approved by the Sheriff and made readily available to the public through its website https://www.sheriff.org Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.88 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 25), states that Broward Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. Therefore, the Mail Jail Facility demonstrated compliance with this part of the standard during this audit.

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, and the documentation provided; the following delineates the audit findings regarding this standard: 115.89 (a) through (d) : Broward County Policy 11.1 Prison Rape Elimination Act (PREA) page 26 mandates Broward Sheriff's Office PREA Coordinator to make all aggregated sexual abuse data, readily available to the public at least annually through the agency website https://www.sheriff.org. All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. This was confirmed during interviews with the PREA Coordinator and the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.401 (a) and (b) The Mail Jail Facility did have a PREA audit during the first and second audit cycles. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (h) The auditor has full access to all locations/areas in the Mail Jail Facility. Therefore, the facility demonstrated compliance with this part of the standard

	during this audit. 115.401 (i) The auditor did obtain all necessary copies of Mail Jail Facility audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (m) The auditor was allowed to interview Mail Jail inmates in a private setting. Before each interview, inmates were informed of: - their right to not speak to the audit team - a brief summary of the purpose of the PREA audit - the fact that the audit team would not ask any personal questions - the audit team background (including the team's independent contractor status) - the confidentiality requirements of the audit team and their name would not be in the facility's report - their right to be from retaliation for speaking to the audit team - how to report any such retaliation from speaking to the audit team - the availability of mental health staff if the conversation brought back bad memories or flashbacks from the past. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (n) The auditor did not receive any correspondence from anyone concerning the Mail Jail PREA audit. Audit notices were observed in the housing units; as well as all common areas. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 Each of the Broward County Sheriff’s Office facilities (North Broward, Main Jail, Joseph V. Conte, and Paul Rein) had a PREA audit in 2021; the final report is

	posted on the agency’s website.

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	**Supervision and monitoring**	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	**Supervision and monitoring**	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	**Supervision and monitoring**	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	**Youthful inmates**	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	**Youthful inmates**	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	**Youthful inmates**	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate’s genital status?	yes
	If an inmate’s genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	**Limits to cross-gender viewing and searches**	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	**Hiring and promotion decisions**	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	**Upgrades to facilities and technologies**	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	**Policies to ensure referrals of allegations for investigations**	

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	**Employee training**	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	**Employee training**	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	**Volunteer and contractor training**	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	**Volunteer and contractor training**	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	**Inmate education**	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	**Inmate education**	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	**Inmate education**	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	**Specialized training: Investigations**	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	**Staff and agency reporting duties**	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	**Staff and agency reporting duties**	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators?	yes
115.62 (a)	**Agency protection duties**	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	**Reporting to other confinement facilities**	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	**Staff first responder duties**	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	**Preservation of ability to protect inmates from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	**Reporting to inmates**	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	**Reporting to inmates**	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	**Disciplinary sanctions for inmates**	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	**Disciplinary sanctions for inmates**	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	**Disciplinary sanctions for inmates**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	**Disciplinary sanctions for inmates**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	**Disciplinary sanctions for inmates**	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	**Disciplinary sanctions for inmates**	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	**Disciplinary sanctions for inmates**	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

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

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	**Data collection**	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	**Data review for corrective action**	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	

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

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes

PREA Facility Audit Report: Final

Name of Facility: Paul Rein Detention Facility
Facility Type: Prison / Jail
Date Interim Report Submitted: 05/30/2024
Date Final Report Submitted: 09/17/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Brian D. Bivens	**Date of Signature:** 09/17/2024

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	04/18/2024
End Date of On-Site Audit:	04/19/2024

FACILITY INFORMATION	
Facility name:	Paul Rein Detention Facility
Facility physical address:	2421 Northwest 16th Street, Pompano Beach, Florida - 33069
Facility mailing address:	

Primary Contact

Name:	Captain Karen Archibald
Email Address:	Karen_Archibald@sheriff.org
Telephone Number:	954-831-8901

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Facility PREA Compliance Manager	
Name:	Richard Giddarie
Email Address:	richard_giddarie@sheriff.org
Telephone Number:	O: (954) 268-7843

Facility Health Service Administrator On-site	
Name:	Elisa Marenco
Email Address:	emarenco@wellpath.us
Telephone Number:	954-826-6801

Facility Characteristics	
Designed facility capacity:	1068
Current population of facility:	575
Average daily population for the past 12 months:	587
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males

Age range of population:	16-91
Facility security levels/inmate custody levels:	Minimum/Medium/Maximum
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	225
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	398
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	171

AGENCY INFORMATION	
Name of agency:	Broward County Sherriff's Office
Governing authority or parent agency (if applicable):	Broward County
Physical Address:	2601 West Broward Boulevard, Fort Lauderdale, Florida - 33312
Mailing Address:	2601 West Broward Boulevard, Fort Lauderdale,
Telephone number:	9542687843

Agency Chief Executive Officer Information:	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Agency-Wide PREA Coordinator Information			
Name:	Joseph Lungha	**Email Address:**	joseph_lungha@sheriff.org

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
4	• 115.15 - Limits to cross-gender viewing and searches • 115.17 - Hiring and promotion decisions • 115.51 - Inmate reporting • 115.65 - Coordinated response
Number of standards met:	
41	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-04-18
2. End date of the onsite portion of the audit:	2024-04-19

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Nancy J. Cotterman Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1328
15. Average daily population for the past 12 months:	587
16. Number of inmate/resident/detainee housing units:	17
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	(●) Yes ( ) No ( ) Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	534
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	13
38. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	3
40. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
41. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
42. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	3

43. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1
44. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	3
46. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	1
47. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The facility does not maintain statistical information for some of the questions in this section 37-47.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	215

50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	171
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	398
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The numbers reflected for questions 50 and 51 reflect the total number of volunteers and contract employees for all four Broward County Sheriff's Office Detention Facilities.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	9
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☑ Age ☑ Race ☑ Ethnicity (e.g., Hispanic, Non-Hispanic) ☑ Length of time in the facility ☑ Housing assignment ☑ Gender ☑ Other ☐ None
If "Other," describe:	Juvenile Status

55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility provided the audit team with inmate rosters. The audit team prioritized targeted interviews at the facility, due to the number of juvenile male inmates. The audit team randomly selected inmates from each housing area.
56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	○ Yes ◉ No
a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:	The audit team conducted nine random inmate interviews and twenty-one targeted interviews. Five of the targeted interviews were with male juvenile inmates.
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no barriers in conducting random inmate interviews. All interviews were conducted in a private setting. Before each interview, the audit team: - described the reason for the interview - specified the role of the audit team and their independent role - the training the audit team has received to conduct PREA audits - the importance of confidentiality and the fact that their name would not be in the report - what to do if they felt retaliation for speaking to the audit team - mental health and victim advocacy services that are available if request
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	21

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	5
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	All inmates with physical disabilities are housed at another Broward County Detention Facility.

61. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	3
62. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	2
63. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
64. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	3
65. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
66. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	The PREA Coordinator, Facility Administrator, PREA Manager could not identify any transgender housed at the facility during the onsite portion of the audit.
67. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	3
68. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	4
69. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	The Facility Command staff could not identify an inmate placed in segregation housing/ isolation for risk of sexual victimization. None of the thirty inmates interviewed indicated they had been placed in segregation for this purpose.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	here were no barriers in conducting targeted inmate interviews. All interviews were conducted in a private setting. Before each interview, the audit team: - described the reason for the interview - specified the role of the audit team and their independent role - the training the audit team has received to conduct PREA audits - the importance of confidentiality and the fact that their name would not be in the report - what to do if they felt retaliation for speaking to the audit team - mental health and victim advocacy services that are available if request It should be noted that the juvenile housing unit was found to be well maintained with an adjacent classroom. All juveniles interviewed stated they felt safe in the facility.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	12

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☑ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No
74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	All staff interviewed displayed a working knowledge of the agency's PREA policy. Each staff member was asked to walk the audit team through a sexual abuse scenario. Each staff member was able to provide the audit team with a sufficient description of their role and response to a sexual abuse allegation.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	23
76. Were you able to interview the Agency Head?	○ Yes ◉ No
a. Explain why it was not possible to interview the Agency Head:	The Lieutenant Colonel was interviewed as a designee.

77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
78. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No
79. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☑ Agency contract administrator ☑ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☑ Line staff who supervise youthful inmates (if applicable) ☑ Education and program staff who work with youthful inmates (if applicable) ☑ Medical staff ☑ Mental health staff ☑ Non-medical staff involved in cross-gender strip or visual searches ☑ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☑ Investigative staff responsible for conducting administrative investigations ☑ Investigative staff responsible for conducting criminal investigations ☑ Staff who perform screening for risk of victimization and abusiveness ☑ Staff who supervise inmates in segregated housing/residents in isolation ☑ Staff on the sexual abuse incident review team ☑ Designated staff member charged with monitoring retaliation ☑ First responders, both security and non-security staff ☑ Intake staff

	☑ Other
If "Other," provide additional specialized staff roles interviewed:	Classification Officer, Classification Supervisor, and supervisors in the juvenile housing unit were also interviewed.
81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	8
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☑ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☑ Religious ☐ Other
82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	5
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☑ Medical/dental ☐ Food service ☐ Maintenance/construction ☐ Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	There was a total of eight agency-wide volunteers interviewed, four WellPath Medical and Mental Health staff interviews, and three Trinity food service staff interviewed. The WellPath staff have received initial, annual, and specialized PREA training. Each contract employee displaced a clear working knowledge the agency's PREA policy along with WellPath's PREA Response Policy. All volunteers and Trinity staff stated they had also completed initial and annual PREA training. Each sufficiently walked the audit team through a sexual abuse allegation scenario.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?	(●) Yes ( ) No
Was the site review an active, inquiring process that included the following:	
85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	(●) Yes ( ) No

86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	(●) Yes ( ) No
87. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	(●) Yes ( ) No
88. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No

89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).

The facility was found to be well maintained. PREA signage is properly posted in every housing unit and in common areas. The audit notices were also properly posted throughout the facility.

The intake for all Broward County facilities is located in the Main Jail, where all new arrestees complete the initial orientation and classification process. Once assigned to Paul Rein Detention Facility, inmates are interviewed by Paul Rein Classification staff and a review of their PREA status is completed.

The facility has a well-maintained housing unit for male juveniles. The unit has a spacious classroom. A schedule of education and programming activities was made available to the audit team. All informal and formal interviews with juveniles revealed the agency provides quality education and programming services to the juvenile population while at the facility.

All food services and laundry services are provided by the Broward County Sheriff's Office Warehouse; located near the Paul Rein Detention Facility.

Housing Units C7 and D8 were empty during the onsite visit. All Housing units were visited by the audit team.

C1	72 beds	Female Max General Population
C2	72 beds	Female Med General Population
C3	72 beds	Female Med General Population
C4	28 beds	Female Segregation
C5	20 beds	Female Residential Housing

C6	64 Beds	Protective Custody
C7	64 Beds	Empty
C8	64 beds	Female Min General Population
C9	64 beds	Female Programs

D1	72 Beds	Male Residential Housing
D2	72 Beds	Male Med General Population
D3	72 Beds	Male Residential Housing
D4	72 Beds	Male Juveniles
D5	64 Beds	Male Min General Population
D6	64 Beds	Male Protective Custody
D7	64 Beds	Male Protective Custody
D8	64 Beds	Empty

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No
91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	The auditor reviewed the following files: Fifteen staff training records. Fifteen staff Human Resource Files. Nine PREA investigation files Twenty Offender Files plus an additional ten to help confirm compliance with standard 115.233 Ten Contract Employee Records Eight Volunteer Records

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	3	0	0	3
Staff-on-inmate sexual abuse	3	0	0	3
Total	6	0	0	6

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	3	0	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	3	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	2	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	1	2	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	6

99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	3
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	The facility had a total of nine PREA allegations that were investigated in the past twelve months. Inmate-on-Inmate Sexual Harassment Unfounded 1, Unsubstantiated 2, Substantiated 0 Inmate-on-Inmate Sexual Abuse Unfounded 0, Unsubstantiated 3, Substantiated 0 Staff/Volunteer/Contract Employee-on-Inmate Sexual Harassment Unfounded 0, Unsubstantiated 0, Substantiated 0 Staff/Volunteer/Contract Employee-on Inmate Sexual Abuse Unfounded 3, Unsubstantiated 0, Substantiated 0 There were a total of three Incident Reviews in the past twelve months and three incidents where retaliation monitoring was conducted. There were no criminal charges referred for prosecution in the past twelve months. All nine investigation files were reviewed by the lead auditor. The documentation was found to be thorough and detailed. The agency has an excellent software system to manage and store PREA investigations, as well as statistical information. All sexual abuse investigations are completed by the agency's specialized sexual abuse criminal investigators. The agency's internal affairs unit investigates all staff related allegations. The Bureau of Investigations and Projects completed an administrative investigation for all PREA allegations.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

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

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the documentation provided: as well as Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-2, Broward County Sheriff's Office Organization Chart, the auditor's observation, and interviews with the Agency-wide PREA Coordinator, and the Paul Rein Detention Facility PREA Manager, it was determined the Paul Rein Detention Facility delineates compliance with Standard 115.11. 115.11 (a) The Paul Rein Detention Facility staff follows the agency's policy, Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-26 which mandates zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. The auditor observed PREA information posted in each housing unit and in many common areas. Inmates are given PREA information upon intake at the Paul Rein Detention Facility. This information is also given to each inmate when they are transferred to any of the Broward County Sheriff's Office facilities. Records review clearly showed

	that all staff, contract staff, and volunteers are trained on the agency's zero-tolerance policy against sexual abuse and sexual assault Informal conversations throughout the onsite process with both random staff and random inmates reviewed that the agency's PREA policy and processes are significantly embedded into the culture of the Paul Rein Detention Facility. Informal conversations with staff and inmates at the Paul Rein Detention Facility confirmed the facility has institutionalized the agency's zero-tolerance policy for sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.11 (b) and (c) The agency employs an upper-level, agency-wide PREA Coordinator. The organization chart provided to the auditor shows the PREA Coordinator is an Executive Lieutenant and is an upper-level staff member with at least one PREA Manager at each of the four facilities. Lt. Lungha was appointed as the agency-wide PREA Coordinator. Lt. Lungha oversees the PREA process at the Mail Jail, the Paul Rein Facility, the North Broward Bureau, and the Joseph V. Conte Facility. Lt. Lungha reports directly to Major Kevin Corbett. Lt. Lungha is very knowledgeable of the PREA standards and actively assists the facility with compliance. Lt. Lungha has the authority to develop, implement, and oversee PREA compliance. He is actively updating the facility as new Frequently Ask Questions (FAQs) results are published on the PREA Resource Center website. The Broward County Sheriff appointed Executive Lieutenant Richard Giddarie to the position of PREA Manager at the Paul Rein Detention Facility. During interviews with the PREA Coordinator and the PREA Compliance Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The Paul Rein Detention Facility meets this standard due to the fact it employs an agency-wide PREA Coordinator and a PREA Compliance Manager for each of the four facilities. Therefore, this standard was found to comply with this audit.

115.12	**Contracting with other entities for the confinement of inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.12 Based on the documentation provided: as well as, auditor observations, and interviews with the random staff, PREA Coordinator, and the Paul Rein Detention Facility PREA Manager, it was determined the Paul Rein Detention Facility does not contract with other facilities to house inmates assigned to their custody. The Broward County Sheriff's Office does not contract with other agencies for the confinement of those in their custody. Therefore, this standard was found to comply with this audit.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on staff interviews, review of documentation provided, and review of the Paul Rein Detention Facility staffing analysis (February 1, 2024), Policy 11.1 Prison Rape Elimination Act (PREA), and Policy 4.1 Facility/cell inspections, observations checks, and security rounds. The following delineates the audit findings regarding this standard: 115.13 (a) The facility has documented and made its best efforts to comply regularly with a 12-page staffing plan that provides for adequate levels of staffing as described and required by this standard. The established staffing plan uses the criteria found in standard 115.13 (a) 1. Generally Accepted Detention and Corrections Practices 2. Findings of Inadequacy: a. Judicial b. Federal Investigative Agencies c. Internal or External Oversight Bodies d. Applicable State and Local Laws, Regulations, or Standards 3. Facility Overviews a. Components of Physical Plant b. Composition of the Inmate Population c. Number and Placement of Supervisory Staff d. Institutional Programs and Schedule e. Prevalence of Substantiated and Unsubstantiated PREA Allegations f. Recommendations and Initiatives Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. There have not been any judicial findings of inadequacy in the past twelve months. During the onsite portion of the audit, the auditor did observe:

- the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift

- staff line of sight and assess whether there are blind spots

- areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored

- the level of supervision and frequency of cell checks in housing areas

- indirect supervision practices, including camera placement

No concerns were noted during the tour. Staffing levels in the Broward County Sheriff's Office staffing plan are agreed upon through an annual review process with all bargaining units. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on the shift roster and submitted to the Paul Rein Detention Facility PREA Manager outlining the reason(s) for the deviation. There has not been any deviation reported where the staffing plan had not been complied with in the past twelve months, as confirmed by written documentation and during an interview with the Paul Rein Detention Facility PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Major for review. It is then forwarded to Sheriff Tony with any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The annual staffing plan is also reviewed by the Federation of Public Employees. The last Annual Staffing Plan assessment was completed on February 1, 2024. The next scheduled review date is February 2025. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (d) Based on Paul Rein Detention Facility Shift Supervisor interviews, facility JMS logs, staff interviews, and policy 4.1 Facility/cell inspections, observation checks, and security rounds, Intermediate-level or higher-level supervisors (Sergeant and Lieutenants) are required to conduct and document unannounced rounds on all shifts as require. Cheick were reviewed for the following dates:

May 25-26, 2024 September 6-8, 2024
April 2-3, 2024

	A random documentation review showed within a 72-hour period; more than a dozen unannounced rounds were conducted in each facility. Such rounds are logged in the Jail Management System (JMS) inmate management software system. This was confirmed during an interview with a Lieutenant at the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.14	**Youthful inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.14 Based on the auditor observation, documentation provided, 11.33 Secure Custody of Juveniles and Reporting Requirements, 11.1 Prison Rape Elimination Act (PREA), Classification Housing, Work and Programs Plan, interviews with the Major, PREA Coordinator, PREA Manager random youthful offenders, and staff interviews, Interview's with five youthful offenders: the following delineates this standard: 115.14 (a) Broward County policy 11.1 Prison Rape Elimination Act (PREA) states that youthful detainees will be separated at all times during the intake process and housing. Such detainees will be supervised under direct supervision guidelines. 11.33 Secure Custody of Juveniles and Reporting Requirements policy states such detainees will be separated by sight, sound, and physical contact with the adult inmate/ detainee population. Females are housed at North Broward and male juveniles are housed at Paul Rein Detention Facility. This was verified during interviews with eight youthful detainees and observations by the auditors during the outside visit. The juvenile housing unit was spacious in size and had an adjacent classroom and recreation area. Main services are brought the juvenile unit, including medical, mental health, food service, and programing. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.14 (b) Broward County policy 11.1 Prison Rape Elimination Act (PREA) states that youthful detainees will be separated at all times during the intake process and housing. Such detainees will be supervised under direct supervision guidelines. 11.33 Secure Custody of Juveniles and Reporting Requirements policy states such youthful inmates/detainees will be separated by sight, sound, and physical contact with the adult inmate/detainee population. The Paul Rein Detention Facility Housing Plan outlines the daily activities of youthful detainees, including education services and recreation times. The auditor reviewed the daily activity schedule for the juvenile inmates. The juvenile housing unit was spacious in size and had an adjacent

	classroom and recreation area. Main services are brought the juvenile unit, including medical, mental health, food service, and programing. This was verified during interviews with five youthful detainees random staff interviews, and observations by the auditors during the outside visit. Females are housed at North Broward and male juveniles are housed at the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.14 (c) Juvenile females are housed at North Broward and male juveniles are housed at Paul Rein. This was confirmed during an interview with the PREA Manager and through auditor observation during the onsite visit. During an interview with the Paul Rein Detention Facility PREA Manager, it was determined that there have not been any youthful detainees housed outside of the designed housing units at North Broward and Paul Rein in the past twelve months for any reason. The juvenile housing unit was spacious in size and had an adjacent classroom and recreation area. Main services are brought the juvenile unit, including medical, mental health, food service, and programing. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15	**Limits to cross-gender viewing and searches**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), training curriculums, staff interviews, training file reviews, SOP 5.9 Inmate-Facility Searches and Disposition of Contraband, and documentation provided; the following delineates the audit findings regarding this standard: 115.15 (a) Broward County SOP 5.9 Inmate-Facility Searches and Disposition of Evidence (page 12) outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed that cross-gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. According to the PREA Coordinator, there have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. This was reiterated during an interview with the Paul Rein Detention Facility PREA Manager. During the tour, the auditor did: - observe areas used to conduct strip searches, visual body cavity searches, and pat-down searches and assess whether opposite-gender staff

- conducted informal conversations with staff and persons confined in the facility regarding search procedures

The auditor did not note is issues during the tour. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) and prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. This practice was confirmed during female inmate interviews.

115.15 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) prohibits frisk/pat searches of female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. If a search is completed under exigent circumstances, the search is documented in the Jail Management System. There were no reported searches completed under exigent circumstances in the past twelve months. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. This practice was confirmed during female inmate interviews.

115.15 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without a non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets, and changing their clothes. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) also require staff of the opposite gender to announce their presence before entering the housing units. During the tour, the auditor did:

- observe areas where confined persons may be in a state of undress, such as showering, using the toilet, and/or changing their clothes.

- observe if any nonmedical staff of the opposite gender can view confined persons in a state of undress, including from different angles and via mirror placement.

- observe electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of confined persons

- observe the method(s) used to alert individuals confined in the facility that an opposite-gender staff person has entered a housing unit/area where they are likely to be in a state of undress

	- conducted informal conversations with staff regarding cross-gender viewing, including camera monitoring staff - conducted informal conversations with inmates regarding knock and announce practices of the staff There were no significant issues noted. Inmate and staff interviews revealed that opposite-gender announcements were common practice at this facility and reminders of this requirement are posted on the entry doors of all housing units exceeding the requirements of this part of the standard during this audit. 115.15 (e) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13), the training curriculum provided, and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. This was corroborated during interviews with a LBGTI inmate and random staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 6), training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This is outlined in Broward County Sheriff's Office roll call training SOP 11.1 and the BCSO Lesson Plan. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. During an interview with a LBGTI inmate, it was confirmed that the inmates felt the staff conducted proper searches. There were also no complaints filed by the LBGTI inmates at the Paul Rein Detention Facility in the past twelve months related to searches. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16	**Inmates with disabilities and inmates who are limited English proficient**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practice, review of the lesson plans, and review of

WellPath Language Interpreter Services, ERO Sign Language interpretation Services, invoices, as well as staff and inmate interviews and facility tour; the following delineates the audit findings regarding this standard:

115.16 (a) The Paul Rein Detention Facility takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through WellPath with the Language Line Services. The facility also makes available TDD phones at each facility. The facility has a significant number of bi-lingual employees to assist with interpreter needs. During interviews with the inmates identified to meet the aspects of this standard, they all confirmed having received training and materials they could understand. The inmates and staff also confirmed that the Language Line is available when needed. The auditor was provided with invoices and payments for Language Line Services. There was two blind/low vision, one deaf/hearing impaired, three with cognitive impairments, and three limited-English proficient inmates interviewed during the onsite visit. All nine targeted inmates displayed a solid working knowledge of the agency's zero tolerance for sexual abuse and sexual harassment, and all were able to list the internal and external reporting mechanisms that the facility provides. During the onsite portion of the audit, the auditor:

- Tested the facility's process for securing interpretation services
- Determined if inmates must self-identify to gain the services
- Assessed the availability of interpretation services
- Observed the location of interpretation services

There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (b) The Broward Sheriff's Office takes 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, including steps to provide interpreters who can interpret effectively accurately and impartially. Language Line interpreter services and/or staff interpreters are used to translate at this facility. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a

	Memorandum of Understanding through WellPath with the Language Line Services. There were three limited-English inmates interviewed (with the assistance of a staff interpreter) during the on-site visit and they confirmed during interviews receiving all written PREA information and viewing the Spanish and/or Creole version of the PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. The facility also makes TDD phones in each facility. The Paul Rein Detention Facility has a large number of bi-lingual employees to assist with interpreter services. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9)) outlines these practices. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9) illustrates the facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. PREA handouts, PREA posters, PREA education video, and the Inmate Handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through WellPath with the Language Line Services. This was confirmed during interviews with First Responders, the Paul Rein Detention Facility PREA Manager, and the PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 4 and 5), Human Resource staff interviews, BSO DJ# 194 PREA Questionnaire, and fifteen staff personnel file reviews; Sheriff's Policy Manual 2.1 Employee Standards of Conduct, the following delineates the audit findings regarding this standard: 115.17 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 4-5) outlines that Broward Sheriff's Office does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer 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, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force,

or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The facility completes thorough background checks on all applicants as well as a background check is completed on all new applicants confirming compliance. Staff have been trained on the agency's DJ# 194 PREA Questionnaire. The Agency has fourteen trained background investigators. Background investigations include:

Florida Law Enforcement Division

BSO CAD

BSO Records

BSO Warrants

Surrounding Jurisdictions

Reference Checks

Interpol

Prior Employers

Military History

This practice was confirmed during interviews with the agency's Human Resource Director and the PREA Investigator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Broward Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer, who may have contact with inmates. This was confirmed during the review of ten agency-wide human resource files for contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 The Broward Sheriff's Office requires a criminal background record check to be completed before hiring any new employee. Fifteen out of fifteen Human Resource files confirmed this practice.

The agency has fourteen trained background investigators. Background investigations include:

Florida Law Enforcement Division

BSO CAD

BSO Records

BSO Warrants

Surrounding Jurisdictions

Reference Checks

Interpol

Prior Employers

Military History

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 Broward Sheriff's Office makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. The agency has fourteen Background Investigators. A review of fifteen Human Resource files illustrated this practice. Two applicants had previously worked at a prior institution; both times, the Background Investigator had sent and received the prior documentation from the previous employer. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) Broward Sheriff's Office requires a criminal background record check to be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Ten out of ten agency-wide WellPath and Trinity files reviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) Broward Sheriff's Office completes background checks every five years. There is an extensive tracking system in place to monitor the process. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) outlines the requirements. The facility has enrolled in the NCIC program RapBack; the program provides designated administrative staff with arrest information of staff members. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Broward Sheriff's Office instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. Each subsequent year of employment, employees are required to sign the agency's Policy

	Manual. Page three of the Sheriff's Policy Manual informs staff they are under Broward County Sheriff's Office colors while not on duty; specifically, when working for another employer. File review showed that fifteen out of fifteen files contained a signed acknowledgment of this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (g) Broward County Sheriff's Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. The PREA Coordinator stated there have not been any terminations of a contract employee for this circumstance in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (h) Broward County Sheriff's Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The PREA Coordinator stated the agency has not received such a request in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon BJA FY 2022 Implementing the PREA Standards, Protecting People Who are Incarcerated, and Safeguarding Communities 15PBJA-22-GG-01653-PREA, review of Broward Sheriff's Office physical plant, Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews and review of OAS documentation provided; the following delineates the audit findings regarding this standard: 115.18 (a) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. During this audit cycle, The

	Broward Sheriff’s Office Department of Detention has been awarded the Implementing the PREA Standards, Protecting People Who are Incarcerated, and Safeguarding Communities grant from the Department of Justice, Office of Justice Programs that will pass through Broward County. The grant amount is $250,000 to be used to fund one new Accountability Specialist position FTE salary and fringe, attending training/conferences, purchasing PREA-related equipment, and funding over time. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.18 (b) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency’s ability to protect inmates from sexual abuse. During this audit cycle, there were substantial enhancements to the video technology at the Paul Rein Detention Facility. All identified blind spots were addressed and staff as well as inmates/detainees confirmed during interviews they felt safer with the changes in place. State and Federal grants were utilized and replaced 41 cameras and added 48 for a total of 252. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21	**Evidence protocol and forensic medical examinations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), investigative staff interviews, Facility Captain interview, 05-10-01 Sexual Misconduct Battery Intervention and Response Procedures, and review of OAS documentation provided; this delineates the audit findings regarding this standard: 115.21 (a) and (b) Broward Sheriff’s Office complies with all elements of this standard. Documented in Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20); the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. Broward Sheriff’s Office conducts its own PREA criminal investigations. The Broward County Sheriff’s Office investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the Broward County Sheriff’s Office Bureau of Investigations and Projects investigators on each case. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (c) Broward Sheriff’s Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. During the past twelve months, there has not been any inmate who alleged sexual abuse that constituted the need for a SANE exam. An interview with the Facility Captain confirmed this practice. The facility investigated six sexual abuse allegations; three were deemed to be unfounded and three were classified as unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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115.21 (d) The Broward Sheriff’s Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020) which agrees to provide outside victim advocacy services to the inmates. The services of these victim advocates have not been requested or used by the inmates during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (e) Broward Sheriff’s Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020); which agrees to provide outside victim advocacy services to the inmates upon request. Interviews with the agency-wide PREA Coordinator and three agency PREA investigators confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (f) The Broward Sheriff’s Office is responsible for administrative investigations and criminal investigators with the Broward County Sheriff’s Office shall conduct all criminal investigations covering all aspects of this standard. Broward Sheriff’s Office conducts its own PREA criminal investigations. This was confirmed during an interview with the PREA Coordinator and during the review of all nine PREA investigation (six sexual abuse and three sexual harassment) files from the past twelve months from the Paul Rein Detention Facility. Therefore, this part of the standard is not applicable to this facility.

115.21 (g) The Broward Sheriff’s Office is exempt from this section because the Broward County Sheriff's Office conducts its own PREA criminal investigations.

115.21 (h) Broward Sheriff’s Office offers all victims of sexual abuse access to

	forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Nancy J. Cotterman Center (NJCC) also supplies victim advocates upon request for the victims of sexual abuse. This was confirmed during an interview with WellPath contracted medical and mental health staff members. Therefore, this part of the standard is not applicable to this facility.

115.22	**Policies to ensure referrals of allegations for investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 19-20) investigative staff interviews, PREA Coordinator Interview, Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC), and review of OAS documentation provided; the following delineates the audit findings regarding this standard: 115.22 (a) The Broward Sheriff's Office is required to investigate all PREA complaints received at this facility. Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). All potential criminal activity is referred to the Broward County Sheriff's Office PREA Investigator assigned to the Paul Rein Detention Facility. There were six cases of sexual abuse referred and investigated during this audit cycle. Three cases were unfounded and three were deemed as unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (b) All PREA allegations are investigated by the Broward Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Broward County Sheriff's Office PREA Investigator for criminal investigation and prosecution as warranted. This was confirmed during an interview with the PREA Coordinator. This policy is published on the agency website *https.//www.Broward County.com/the-prison-rape-elimination-act-of-2003-prea* as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (c) The Broward Sheriff's Office refers all criminal allegations for the investigation to the designated Broward County Sheriff's Office PREA investigators. This was confirmed during an interview with the PREA Coordinator. The requirements of this part of the standard are outlined in the policy that is posted on the website *https.//www.Broward County.com/the-prison-rape-elimination-act-of-2003-prea*.

	Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) staff interviews, twelve random staff interviews, fifteen random staff training file review, review of OAS documentation provided the BSCO 19-page PREA Training Lesson Plan, PREA Roll-Call SOP 11.1 PREA, sign-in sheets, signed acknowledgment forms, training curriculums, and employee handouts); the following delineates the audit findings regarding this standard: 115.31 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) requires Broward Sheriff's Office to train all their employees who have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' right to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.31 (b) The training is tailored to both the male and female gender of the inmates at Broward Sheriff's Office; this is done because staff may transfer to any of the four agency facilities. This was confirmed after reviewing the 19-page PREA training lesson plan and an interview with the Training Staff. Twelve out of twelve random staff interviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receive annual refresher PREA training during in-service according to policy 11.1 which meets the requirements of this standard. Quarterly roll-call training is conducted quarterly at the Paul Rein Detention Facility. A review of fifteen employee training files illustrated that all fifteen were found to comply with the policy. Therefore, the facility meets this part of the standard during this audit. 115.31 (d) Broward Sheriff's Office documents, through employee examination on Broward County PREA Policy, demonstrating all employees understand the training they have received. Fifteen out of fifteen training file reviews confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32	**Volunteer and contractor training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7), eight volunteer and ten contractor interviews, random training file review and review of OAS documentation provided, Civilian Security PREA Orientation Packet, sign-in sheets, signed acknowledgment forms, training curriculums, and handouts; the following delineates the audit findings regarding this standard: 115.32 (a) Broward Sheriff's Office ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Broward Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Broward County Sheriff's Office Civilian Security PREA Orientation Packet outlines the training given to all volunteers and contractors.

	Interviews with ten agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. Signature on the Broward County PREA Policy Acknowledgment and/or Broward County Sheriff's Office Training Roster acknowledges each volunteer and contractor has received and understands the PREA training provided. Contract employee and volunteer file review confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (b) The level and type of training provided to volunteers and contractors are based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Broward County's zero-tolerance policy regarding sexual abuse and sexual harassment and their requirements to report such incidents. Interviews with ten agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (c) Broward Sheriff's Office documents through signature on the Broward Training Roster, that volunteers and contractors understand the training they have received. Interviews with ten agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33	**Inmate education**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8), nine targeted inmate interviews, twenty random selected inmate records, the Inmate Handbook (multiple languages), random booking video reviews, additional signed Facility Property receipts, PREA Information Card, Facility Orientation, PREA Posters, and the BCSO PREA video; as well as interviews with random inmates and staff; the following delineates the audit findings regarding this standard:

	115.33 (a) During the intake process at Central Booking at the Main Jail, inmates receive information explaining Broward Sheriff's Office's zero-tolerance policy (Broward County Policy 11.1 Prison Rape Elimination Act (PREA)) regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates sign the Facility Property receipt for the Inmate Handbook containing PREA information which is available in English, Creole, and Spanish. Several inmates interviewed initially stated they did not remember signing for and receiving the Inmate Handbook. Signed Property receipts were proved for ten inmates. Additional informal inmate interviews were conducted and video surveillance of ten inmates was reviewed showing the inmates in the intake are of the Mail Jail receiving the PREA Information. All activities for each inmate are electronically stored on their JMS Contact Log, including receipt of the PREA Information in booking, their initial PREA Screening, their 30-day reassessment, their PREA comprehensive education. This was confirmed during an interview with the Classification Staff. During the onsite portion of the audit, the auditor did: - How the facility provides the necessary PREA information to all inmates at each BCSO facility - Confirm who is responsible for conducting the intake process - Confirm interpreter services, including location and how to access the service - Reviewed the PREA education deployment methods for inmates with disabilities - Held informal conversations with staff and inmates concerning the PREA education process Therefore, the facility demonstrated compliance with this part of the standard during this audit. Auditor Recommendations: - The agency has agreed to work with their kiosk vendor to create an electronic acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment. - The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process. - The agency should explore the utilization of electronic signature pads to their JMS system. 115.33 (b) Within 30 days of intake, Broward Sheriff's Office provides comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such

	incidents. The additional education is provided in the form of a video (both English, Creole, and Spanish). on the second floor at the Mail Jail during orientation. The video was created by the Broward County Sheriff's Office This practice is outlined in the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8). There were several inmates who did not remember if they had watched the PREA orientation video utilized for the more in-depth training. The agency provided the JSM contact card for ten inmates showing they had watched the video. Additional informal inmate interviews were conducted. All activities for each inmate are electronically stored on their JMS Contact Log, including receipt of the PREA Information in booking, their initial PREA Screening, their 30-day reassessment, their PREA comprehensive education. The agency is in the process of requiring inmates to electronically acknowledge the viewing of the PREA video. The agency is also in the process providing the PREA video on the inmate tablets. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides such education within one year of the effective date of the PREA standards to all its inmates and provides education to inmates upon transfer as required by this standard. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (d) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with WellPath Language Services. PREA handouts, PREA posters, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The facility also makes available a TDD phone at each facility. There was two blind/low vision, three cognitive inmates and one deaf/hard of hearing inmate incarcerated at the time of the onsite visit. All inmates with disabilities hat were interviewed (two blind/low vision, one deaf/hearing impaired, three cognitive) were able to understand the auditor during the interview, and both displayed a working knowledge of the agency's zero-tolerance against sexual abuse and sexual harassment and were able to list the internal and external modes of reporting. Three limited English proficient inmates had documentation in their intake file showing they all had received a PREA Brochure, properly screened, and watched the PREA education video. All three LEP inmates stated they felt safe in the facility. Twenty random inmate records reviewed all twenty inmates signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.33 (e) There was documentation provided of inmates' participation in PREA educational sessions as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (f) The Broward Sheriff's Office does provide the inmates with posters, PREA card and an inmate handbook in English, Creole, and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates/detainees are given the PREA Card. The audit team reviewed random booking videos showing inmate receiving the PREA cards during the intake process. The agency has "Zero Tolerance" Posters located in all common areas of the facility. Records review showed that LEP inmates received education information in a Spanish format; all three LEP inmates stated they felt safe in the facility. During the onsite portion of the audit, the auditor: - observed whether signage throughout the facility can be easily read/accessed by persons in the facility - observed if the signage was clear and easy to understand - observed if the signage was in multiple languages - observed the text size, formatting, and physical placement of the signage - observed if the signage was obscured or unreadable due to damage or graffiti -observed whether the information on the signage was accurate and consistent throughout the facility - held informal conversations with staff and inmates concerning the signage Auditor Recommendations: - The agency has agreed to work with their kiosk vendor to create an electronic acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment. - The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process. - The agency should explore the utilization of electronic signature pads to their JMS system. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices as well as, Policy 11.1 Prison Rape Elimination Act (PREA) page 7, Moss Group Training Certificates, Investigators training file review, and three investigative staff interviews; the following delineates the audit findings regarding this standard: 115.34 (a) In addition to the general training provided to all employees Broward Sheriff's Office ensures that the PREA Administrative Investigators receive training in conducting investigations in confinement settings. This was confirmed during a review of the Investigation's training records. The Broward County Sheriff's Office conducts all PREA criminal investigations. Investigators have specialized training for sexual assault in a confinement setting. The agency has thirteen PREA criminal investigators PREA administrative investigators. The auditor found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency has thirteen PREA criminal investigators PREA administrative investigators. The auditor found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (c) Broward Sheriff's Office maintains documentation that Broward County Sheriff's Office investigators have completed the required specialized training in conducting sexual abuse investigations. Broward County Sheriff's Office requires investigators to have specialized training for sexual assault in a confinement setting. The auditor found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35	Specialized training: Medical and mental health care

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based on a review of the Broward Sheriff's Office practices, as well as the WellPath HCD-100_F-06 Response to Sexual Abuse Broward County Lesson Plan, PREA Specialized Medical/Mental Health training records, WellPath training file review, and staff interviews; the following delineates the audit findings regarding this standard:

115.35 (a) Broward County Sheriff's Office utilized the services of WellPath, a contracted medical and mental health service provider. Broward County provides PREA Specialized Medical/Mental Health training video, curriculum provided, and training file Broward Sheriff's Office review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. WellPath HCD-100_F-06 Response to Sexual Abuse Broward County Lesson Plan (page 6) outlines this policy. A review of four training records and interviews with four agency-wide contracted WellPath Medical Staff members confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (b) The medical staff at this facility does not conduct forensic exams. This was confirmed during interviews with the WellPath Medical Staff and the PREA Coordinator. Broward Sheriff's Office has a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) for SANE/SAFE examinations. Therefore, this part of the standard does not apply to this facility.

115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. The training is an online course entitled; PREA Specialty Training for Medical and Mental Health Staff. A review of four training records and interviews with four agency-wide WellPath staff members confirmed this practice. Multiple training sign-in sheets were provided to the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (d) Medical and mental health care practitioners with WellPath also receive the annual training mandated for all employees, contractors, and volunteers. A review of four training records and interviews with four agency-wide WellPath staff members confirmed this practice. Therefore, the facility demonstrated compliance

	with this part of the standard during this audit.

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-11), inmate and staff interviews, twenty inmate file reviews, BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy, and a review of the Broward Sheriff's Office Sexual Abuse Screening Tool 11.1B; the following delineates the audit findings regarding this standard: 115.41 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) and the BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates that Broward Sheriff's Office ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Random inmate interviews confirmed this practice. Inmates sign a facility property receipt, indicating they have received the Inmate Handbook. Some inmates interviewed stated they did not remember receiving a PREA Card upon intake. Main Jail Intake videos were reviewed. All ten videos clearing showing inmates walking around the intake area with the PREA Card in their possession. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. The Handbook outlines basic information on the topics of sexual assault and sexual harassment, the agency's zero tolerance, reporting procedures, and the victim advocacy support available. During the onsite portion of the audit, the auditor: - confirmed that Classification Staff are responsible for risk screenings - assessed whether the screening process occurs in a setting that ensures as much privacy as possible - assessed whether screening staff asked screening questions in a manner that fosters comfort and elicits responses - held informal conversations with staff conducting the risk screening Auditor Recommendations: - The agency has agreed to work with their kiosk vendor to create an electronic

	acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment. - The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process. - The agency should explore the utilization of electronic signature pads to their JMS system. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (b) All newly arrested individuals are booked into Central Intake at the Main Jail. The Broward Sheriff's Office provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. This process is documented on (Broward County) Assessment Questionnaire Form. Twenty out of twenty Classification files reviews confirmed this practice. Screenings are completed by both the contracted medical staff and the Classification staff. Classification makes the final assessments, housing decisions and alert status notifications. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (c) Based on the documentation provided and twenty inmate file reviews the facility utilizes an objective screening instrument that covers all aspects of this standard. Twenty out of twenty Classification files confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (d) The intake screening instrument (Broward County) Sexual Abuse Screening Tool considers, 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; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent;

(6) Whether the inmate has prior convictions for sex offenses against an adult or child;

(7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(8) Whether the inmate has previously experienced sexual victimization;

(9) The inmate's own perception of vulnerability; and

(10) Whether the inmate is detained solely for civil immigration purposes.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Broward Sheriff's Office Assessment Questionnaire Form. The review of the form confirms compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates within 30 days from the inmate's arrival, the Broward Sheriff's Office will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Broward Sheriff's Office since the intake screening. The Classification Staff completes a follow-up interview with each inmate within 30 days to determine if additional information is available. This process is documented on the Broward Sheriff's Office Assessment Questionnaire Form. Therefore, the facility demonstrated compliance with this part of the standard during this audit. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates Broward Sheriff's Office will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. A review of rescreening showed there was a clear handoff from the PREA Manager and the Screening staff when circumstances warranted a reassessment. A reassessment was viewed by the auditor during the onsite visit. Therefore, the facility demonstrated

compliance with this part of the standard during this audit.

115.41 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office does not discipline inmates for refusing to answer screening questions or not disclosing complete information. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (i) Broward Sheriff's Office implements appropriate controls on the dissemination 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. Based on policy review, interview with the Colonel and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Staff responsible for inmate movements have access to see who is listed as an aggressor and/or a victim; lists are maintained in the agency's Jail Management System. All sex offenders are housed in a segregated unit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11), BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy, inmate and staff interviews, file review, and a review of the Broward County) Assessment Questionnaire Form; the following delineates the audit findings regarding this standard: 115.42 (a) Broward Sheriff's Office uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. This was confirmed during a review of policy and an interview with the Paul Rein Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstant with the agency's policy; therefore, requiring corrective action. **Corrective Action:**

	The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility. **Response to Corrective Action:** A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label. A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell. In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others The agency has also added new special condition flags for the following individuals: Speech or cognitive disability Self identifies as LGBTQ Limited English Proficient (LEP) These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes. The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy requires Broward Sheriff’s Office makes individualized determinations about

how to ensure the safety of each inmate. This was confirmed during a review of policy and an interview with the Paul Rein Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstant with the agency's policy; therefore, requiring corrective action.

Corrective Action:

The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility.

Response to Corrective Action:

A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label.

A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell.

In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others

The agency has also added new special condition flags for the following individuals:
Speech or cognitive disability
Self identifies as LGBTQ
Limited English Proficient (LEP)

These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes.

The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the

standard during this audit.

115.42 (c) Broward Sheriff's Office outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on a case-by-case basis as required by this standard. Based on interviews with the self-identified LBGTI inmates housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) documents the Paul Rein Detention Facility procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Based on interviews with the self-reported LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. The inmates also confirmed the Paul Rein Detention Facility PREA Manager always inquired about the inmate's safety. Documentation provided revealed that a review was conducted and documented every six months as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (e) Broward Sheriff's Office requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. Based on interviews with self-identified LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety regarding housing assignments. Once a transgender inmate is processed into the facility, a multi-disciplinary team reviews the inmate's housing, programming, and worker status based on the inmate's own views, medical and mental health history, prior institutional behavior record, and programming needs. The multi-disciplinary team will then make an individualized assessment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 14) requires that Broward Sheriff's Office transgender and intersex inmates be given the opportunity to shower separately from other inmates. The self-identified LBGTI inmates confirmed during the interview with this auditor being given the opportunity

	to shower separately. The decision for housing and program placement for a transgender inmate is documented on the Broward Sheriff's Office in the JMS. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) stipulates that Broward Sheriff's Office does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. This was confirmed by the auditor's observation during the onsite visit, interview with nine self-identified LBGTI inmates and discussion with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43	**Protective Custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), twelve random staff interviews, one segregation staff member, thirty inmate interviews, PREA Manager Interview, and documentation review; the following delineates the audit findings regarding this standard: 115.43 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that inmates/detainees at high risk for sexual victimization are not placed 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. These policies outline the procedures to ensure compliance with this standard. PREA Coordinator, a Segregation Staff, and thirty inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) stipulates that inmates/detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If the Broward Sheriff's Office restricts access to programs, privileges, education, or work opportunities, the Broward Sheriff's Office documents the

	opportunities that have been limited, the duration of the limitation, and the reasons for such limitations. This was confirmed during an interview with the Paul Rein Detention Facility PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (c) Broward Sheriff's Office assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. The PREA Manager Segregation Staff, and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past 12 months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51	**Inmate reporting**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 2-3), the Inmate Handbook, PREA Brochures, and posters provided to inmates were utilized to verify compliance with this standard. The following delineates the audit findings regarding this standard: 115.51 (a) Broward Sheriff's Office provides multiple internal ways for inmates to report incidents of abuse or harassment: they include; · Call Broward Sheriff's Office PREA hotline at (954) 831-3775 · Report to any staff, volunteer, contractor, or medical or mental health staff · Submit a grievance, inmate request, or a sick call slip · Report to the PREA Coordinator or PREA Compliance Manager · Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on the inmate's behalf by calling (954) 831-3775 · Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273) · Write a letter to Nancy J. Cotterman Center 400 N.E. 4th Street

Fort Lauderdale, FL 33301

Posters are located in each housing unit and all common areas in English, Creole, and Spanish outlining the multiple processes by which inmates can report sexual abuse and/or sexual harassment. The auditor successfully tested the phone system during the facility tour. Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and the PREA video; as well as interviews with random inmates and staff. During the onsite portion of the audit, the auditor did:

- How the facility provides the necessary PREA information to all inmates at each BCSO facility

- Confirm who is responsible for conducting the intake process

- Confirm interpreter services, including location and how to access the service

- Reviewed the PREA education deployment methods for inmates with disabilities

- Held informal conversations with staff and inmates concerning the PREA education process

There were no issues noted. The agency investigated nine PREA allegations in the past twelve months; the following is the how the allegations were reported:

- Grievance 1

- Kiosk 5

- Integral Hotline 2

-Third-Party Witness (another inmate) 1

The PREA hotline reporting phone number is affixed to each inmate telephone in the facility. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.51 (b) Broward Sheriff's Office provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Broward Sheriff's Office, and that can receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The Broward Sheriff's Office has by Memorandum of Understanding provided the address and phone number for Nancy J. Cotterman Center (NJCC) to the inmates satisfying the requirements of this standard. The auditor successfully tested the phone system during the facility tour. Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and

	the PREA video; as well as interviews with random inmates and staff. During the onsite portion of the audit, the auditor did: - Review how the facility provides the necessary PREA information to all inmates at each BCSO facility - Confirm who is responsible for conducting the intake process - Confirm interpreter services, including location and how to access the service - Reviewed the PREA education deployment methods for inmates with disabilities - Held informal conversations with staff and inmates concerning the PREA education process There were no issues noted. During the onsite portion of the audit, the auditor also: - observed whether signage throughout the facility can be easily read/accessed by persons in the facility - observed if the signage was clear and easy to understand - observed if the signage was in multiple languages - observed the text size, formatting, and physical placement of the signage - observed if the signage was obscured or unreadable due to damage or graffiti -observed whether the information on the signage was accurate and consistent throughout the facility - held informal conversations with staff and inmates concerning the signage There were no significant issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.51 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. All staff, volunteers, and contractors have been trained in the mandatory reporting laws in the State of Florida; all confirmed this practice during interviews. This philosophy was confirmed during the review of the agency's PREA investigation files. During the onsite portion of the audit, the auditor: - Assessed the accessibility of writing instruments - Observed how mail moves through the facility - Accesses the security of written communications - Held informal conversations with staff responsible for sending and receiving

	inmate mail - Held informal conversations with staff concerning external reporting methods - Accessed how reports can be anonymous - Accessed inmate access to phones, kiosks, and tablets - Tested both internal and external reporting procedures. No significant issues were noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.51 (d) Broward Sheriff's Office staff may privately report sexual abuse and sexual harassment to the Broward County Sheriff's Office Internal Affairs Division or the PREA external telephone number. Informational posters are located throughout all facilities including common areas, administration areas, and inmate housing areas. This information includes the telephone number and address of the Nancy J. Cotterman Center (NJCC). Staff receive quarterly Roll Call training on reporting requirements through the Roll-Call Training SOP 11.01 PREA. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15 , staff interviews, inmate interviews, an interview with the agency-wide PREA Coordinator, and OAS documentation review; the following delineates the audit findings regarding this standard: 115.52 (a) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During the past 12 months, The Paul Rein Detention Facility has received one filed grievance concerning sexual abuse. An interview with the PREA Coordinator confirms this process. The agency investigated nine PREA allegations in the past twelve months; the following is the how the allegations were reported:

- Grievance 1

- Kiosk 5

- Integral Hotline 2

-Third-Party Witness (another inmate) 1

The agency complies with this section of the standard.

115.52 (b) The Paul Rein Detention Facility does not impose a time limit on when offenders/detainees may submit a grievance regarding an allegation of sexual abuse. The Paul Rein Detention Facility has received one grievance concerning sexual abuse in the past twelve months. An interview with the PREA Coordinator confirms this practice. Therefore, the agency complies with this section of the standard.

115.52 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states the agency will ensure that offenders/detainees alleging sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past twelve months, the Paul Rein Detention Facility has had one grievance filed concerning sexual abuse. This was confirmed by the PREA Coordinator in the Online Audit System provided by the PREA Resource Center. Additionally, the grievance was not referred to the staff member who is the subject of the complaint. The grievance/PREA investigation file was reviewed by the auditor. The investigation was detailed with an outcome of UNFOUNDED. Therefore, the agency is in compliance with this section of the standard.

115.52 (d) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require it, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for the reply, including any properly noticed extension, the offenders/detainee complainant may consider the absence of a response to be a denial at this level. During the past twelve months, the Paul Rein Detention Facility has had one grievance filed concerning sexual abuse. The grievance/PREA investigation file was reviewed by the auditor. The investigation was detailed with an outcome of UNFOUNDED. Interview with the PREA Coordinator reiterates this process; therefore, the agency is found to comply with this section of the standard.

	115.52 (e) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states third parties including fellow offenders/detainees, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the offenders/detainees decline to have the request processed on his or her behalf, the agency shall document the offenders/detainees' decision. During the past twelve months, the Paul Rein Detention Facility has had one grievance concerning sexual abuse. The grievance/PREA investigation file was reviewed by the auditor. The investigation was detailed with an outcome of UNFOUNDED. The PREA Coordinator confirmed this process. Therefore, the agency compiles with this section of the standard. 115.52 (f) The Broward County Sheriff's Office Policy 11.1 PREA page 14, states when an offender/detainee is subject to a substantial risk of imminent threat of sexual abuse, the offender/detainee may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent potential sexual abuse. Corrective and protective action must be pursued promptly. Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During the past twelve months, the Paul Rein Detention Facility has had one grievance filed concerning sexual abuse. The grievance/PREA investigation file was reviewed by the auditor. The investigation was detailed with an outcome of UNFOUNDED. Interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.

115.53	**Inmate access to outside confidential support services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practices, staff interviews, inmate interviews, MOU with the Nancy J. Cotterman Center (NJCC) and documentation review; the following delineates the audit findings regarding this standard: 115.53 (a) The agency has entered into a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) which agrees to provide confidential outside victim advocacy services to the inmates at Broward Sheriff's Office. The mailing address

	and telephone number for this agency are made available to all inmates at the facility. Broward Sheriff's Office enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The auditor successfully tested the phone system. The person who answered the call, took the auditor through the process if an actual inmate had contacted them for assistance. The Sexual Assault representative stated they did utilize the bi-lingual employees if they received a call from a limited English Proficient inmate. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Inmates/Detainees are given this information upon intake on the Orientation Checklist. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 22-23) outlines this process. The PREA Coordinator stated the call is free and confidential. During the onsite portion of the audit, the auditor: - Assessed the accessibility of writing instruments - Observed how mail moves through the facility - Accesses the security of written communications - Held informal conversations with staff responsible for sending and receiving inmate mail - Held informal conversations with staff concerning external reporting methods - Accessed how reports can be anonymous - Accessed inmate access to phones, kiosks, and tablets - Tested both internal and external reporting procedures. No significant issues were noted. The agency investigated nine PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 1 - Kiosk 5 - Integral Hotline 2 -Third-Party Witness (another inmate) 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (b) Broward Sheriff's Office informs inmates, before 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 by mandatory reporting laws. All

	calls to the Nancy J. Cotterman Center (NJCC) are not recorded. This was confirmed by the Paul Rein Detention Facility PREA Manager. During the onsite portion of the audit, the auditor also: - observed whether signage throughout the facility can be easily read/accessed by persons in the facility - observed if the signage was clear and easy to understand - observed if the signage was in multiple languages - observed the text size, formatting, and physical placement of the signage - observed if the signage was obscured or unreadable due to damage or graffiti -observed whether the information on the signage was accurate and consistent throughout the facility - held informal conversations with staff and inmates concerning the signage There were no significant issues noted. The agency investigated nine PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 1 - Kiosk 5 - Integral Hotline 2 -Third-Party Witness (another inmate) 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (c) Broward Sheriff's Office maintains a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.54	**Third-party reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the review of Broward Sheriff's Office practices, nine PREA investigation file reviews: as well as a review of the agency website outlining third-party reporting; the

	following delineates the audit findings regarding this standard: 115.54 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 16) mandates that the Paul Rein Detention Facility provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the facility's website at: https://www.sheriff.org. Methods include mailing a letter to the Sheriff, mailing a letter to Broward County, mailing a letter to the South Florida Center against Sexual Abuse or calling the facility directly. The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. A review of PREA investigation files revealed that nine investigations were started and completed based on third party reports. The agency investigated nine PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 1 - Kiosk 5 - Integral Hotline 2 -Third-Party Witness (another inmate) 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61	**Staff and agency reporting duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), Sexual Abuse Incident Check Sheet 14-2C, PREA Response Booklet, staff interviews, and documentation provided, the following delineates the audit findings regarding this standard: 115.61 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), requires all Paul Rein Detention Facility 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 Broward Sheriff's Office; retaliation against inmates 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 agency utilizes a PREA checklist during every sexual abuse investigation. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. The audit did review all nine PREA investigation files; all were detailed and well organized. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15) stipulates that Broward Sheriff's Office requires apart from reporting to designated supervisors or officials, staff 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. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. This was reiterated during an interview with the PREA Manager. The audit did review all nine PREA investigation files; all were detailed and well organized. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (c) Broward Sheriff's Office requires contracted WellPath medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. WellPath Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentially, at the initiation of services. This was confirmed during interviews with two agency-wide WellPath Medical staff; each confirmed their knowledge of mandatory reporting laws in the State of Florida. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 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, the Broward Sheriff's Office reports the allegation to the designated state or local services agency. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (e) Broward Sheriff's Office reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to PREA Investigators as required. File review of nine PREA investigations confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, PREA Investigation file reviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.62 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the Broward Sheriff's Office is subject to a substantial risk of imminent sexual abuse. This was confirmed during twelve random staff interviews. All newly admitted inmates are processed in Central Intake at the Mail Jail. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. The review of nine PREA investigation files clearly illustrated that everyone from line staff, intermediate supervisors, and the PREA Incident Review Team plays specific roles in dealing with PREA allegations. The Paul Rein Detention Facility maintains an updated "PREA Alert" list at all times; this list is made available to all staff charged with the duty of housing movements in the jail management system. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), three PREA Investigator interviews, the Paul Rein Detention Facility PREA Manager interview, and documentation provided; the following delineates the audit findings regarding this standard: 115.63 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Broward Sheriff's Office that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. This process is documented on memorandum. This process was corroborated during interviews with the PREA Manager and the three PREA Investigators. Therefore, the facility demonstrated compliance with this part of the

	standard during this audit. 115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. A documentation review revealed that zero such notifications have occurred during the past twelve months. This was confirmed by the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Broward Sheriff's Office; the allegation is referred immediately to PREA Investigators to be investigated. This was confirmed during interviews with the PREA Manager and three PREA Investigators. The PREA Investigators stated they have not received any notification from another agency in the past twelve months. The agency has completed nine PREA investigations in the past twelve months, they were initially report by: Grievance 1 Third Party (Inmate) 1 Internal Hotline 2 Kiosk 5 Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64	**Staff first responder duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 17-19), staff interviews, contract medical and mental health staff interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.64 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) outlines the responsibilities of all staff members receiving an allegation of sexual

	abuse to follow these guidelines: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.64 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of two contract employees. All twelve random staff interviews confirmed staff is trained in their role and responsibility as first responders. A first responder was also interviewed; it was clear the first responder understood the process as it is outlined in Broward County 11.1 policy. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. All nine PREA investigation files were reviewed by the lead auditor; the files were found to be detailed with witness statements, facility logs, and photos, and each drew a logical conclusion to determine the findings. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.65	**Coordinated response**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, PREA Response Booklet, and documentation provided, the following delineates the audit findings regarding this standard: 115.65 (a) Broward Sheriff’s Office Policy 11.1 Prison Rape Elimination Act (PREA)

	(page 19) has a very comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with Incident Review Team members confirmed their knowledge of the response plan. A PREA Response Booklet is located at every employee workstation in the facility. The Booklet outlines the major components of the agency's PREA policy and procedures, including a detail sexual assault response checklist. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.66	**Preservation of ability to protect inmates from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), interviews with agency head and the PREA Coordinator, collective bargaining agreement, and documentation provided; the following delineates the audit findings regarding this standard: 115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Broward Sheriff’s Office policies on sexual abuse and sexual harassment. The Broward Sheriff’s Office has not entered into any collective bargaining agreements during this audit cycle. This was confirmed during an interview with the Major and PREA Coordinator. The Federation of Public Employees – A Division of the National Federation of Public and Private Employees (AFL-CE0) agreement has specific language outlining the disciplinary sanctions for members involved with PREA incidents. Nothing in the agreement restricts the restricts the agency in the following areas: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76 (2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 21-22), staff interviews, inmate interviews, PREA Retaliation Monitoring Report, and documentation provided; the following delineates the audit findings regarding this standard: 115.67 (a) The Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) policy to protect all inmates and staff at Broward Sheriff's Office who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and designates which staff members or departments are charged with monitoring retaliation. Monitoring is documented on the PREA Retaliation Monitoring Report. The Paul Rein Detention Facility PREA Manager is also the Retaliation Monitor for the facility. There was no required retaliation monitoring conducted during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (b) Broward Sheriff's Office has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Monitoring is documented on the PREA Retaliation Monitoring Report. The Paul Rein Detention Facility PREA Manager is also the Retaliation Monitor for the facility. There was no required retaliation monitoring conducted during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) calls for at least 90 days following a report of sexual abuse, Broward Sheriff's Office monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. Broward Sheriff's Office's monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. Monitoring is documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with the Paul

	Rein Detention Facility PREA Monitor. There was no required retaliation monitoring conducted during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (d), (e), (f) If any other individual who cooperates with an investigation expresses a fear of retaliation, the Broward Sheriff's Office takes appropriate measures to protect that individual against retaliation. Broward County's obligation to monitor shall terminate if the inmate is released from custody. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12), staff interviews, inmate interviews, PREA Retaliation Monitoring Report 14-2D, and documentation provided; the following delineates the audit findings regarding this standard: 115.68 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that Broward Sheriff's Office prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the PREA Manager and Paul Reing Detention Facility, segregation staff and inmates revealed that involuntary segregation has not been used for this purpose in the past twelve months. The Paul Rein Detention Facility PREA Manager stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), Broward County Records Retention Schedule, investigative staff interviews, training certificates, nine investigative reports, Collective Bargaining Agreement, Florida State Statute 112.532 (Law Enforcement and Corrections Officer

	Bill of Rights, as well as interviews with the PREA Investigators, Internal Affairs Investigators, PREA Coordinator, and the PREA Compliance Managers, the following delineates the audit findings regarding this standard: 115.71 (a) Broward County Sheriff's Office PREA investigators conduct an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. Broward Sheriff's Office has a multiple-layered investigation approach for Staff-on-Inmate sexual abuse allegations as a result of Florida State Statute 112.532, which states "the contents of the complaint and investigation shall remain confidential until such time as the employing law enforcement agency makes a final determination whether or not to issue a notice of disciplinary action consisting of suspension with a loss of pay, demotion, or dismissal. Due to Florida Statute 112.532 (Law Enforcement and Corrections Officer Bill of Rights), investigators cannot compel staff to be interviewed for internal affairs investigation. If an allegation of sexual abuse by staff-on-inmate is made, the potential criminal component takes priority, the allegation will immediately be forwarded to the Sex Crimes Unit, then Internal Affairs, and then back to the agency PREA Investigator for final review. All nine investigative files were reviewed, and it appeared that the investigations were conducted promptly, documented thoroughly, and objectively for all allegations, including third-party, and anonymous reports. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (b) Based on training curriculums provided, investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Training records are reviewed so that all Sex Crimes Detectives, all Internal Affairs Investigators, all PREA Managers, and all PREA Investigators have specialized training. The agency has thirteen PREA criminal investigators PREA administrative investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (c) Broward County Sheriff's Office PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. This was confirmed during three interviews with agency PREA investigators. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. The

auditor reviewed all nine PREA investigation files; the files are maintained electronically. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) stipulates, when the quality of evidence appears to support a criminal prosecution, Broward Sheriff's Office refers the case to the Broward County Sheriff's Office Criminal Investigations Division for the criminal investigation. This was confirmed during all nine investigation file reviews and during three interviews with agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as an inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. This was confirmed during interviews with three agency-wide PREA investigators. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) Broward Sheriff's Office administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. This was confirmed during nine investigation file reviews and during three interviews with agency PREA investigators. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (g) Broward Sheriff's Office criminal investigations are documented by the Broward County Sheriff's Office Criminal Investigations Division in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. This was confirmed during investigation file reviews and during three interviews with agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) The Paul Rein Detention Facility refers all allegations to the Broward

	County Sheriff's Office Criminal Investigations Division for investigation and prosecution when warranted. This was confirmed during nine investigation file reviews and during three interviews with agency-wide PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (i) The Broward Sheriff's Office retains all written reports for as long as the alleged abuser is incarcerated or employed by the Broward Sheriff's Office, plus five years. This is stipulated in the Broward County Records Retention Schedule. PREA investigations are stored electronically with limited administrative access to ensure confidentiality. This was confirmed during an interview with the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (j) The departure of the alleged abuser or victim from employment or control of the Paul Rein Detention Facility or agency does not provide a basis for terminating an investigation. This was confirmed during interviews with three agency-wide PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (k) The Broward County Sheriff's Office Criminal Investigators conduct criminal sexual abuse investigations pursuant to the requirements of this standard. This was confirmed during interviews with three agency-wide PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (l) Broward Sheriff's Office refers all criminal cases to the Broward County Sheriff's Office Criminal Investigator and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the Broward County Sheriff's Office Criminal Investigator and the Broward County Sheriff's Office Command Staff. Information is shared electronically on a secure database with limited access. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.72	**Evidentiary standard for administrative investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20), nine PREA investigation file reviews, and three investigative staff interviews; the following delineates the audit findings regarding this standard: 115.72 Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) states the Paul Rein Detention Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. This was reiterated during an interview with three PREA investigators and evident during the nine PREA Investigation File reviews. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73	**Reporting to inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), Inmate/Detainee PREA Allegation Notification Memorandum provided, Close Out Letters, and staff interviews; the following delineates the audit findings regarding this standard: 115.73 (a) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification form letter. Three examples were reviewed by the auditor. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Broward County Sheriff's Office in order to inform the inmate as required by this standard. Broward Sheriff's Office outlines the requirements of the criminal investigation and complies with all aspects of this

standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Broward Sheriff's Office practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

(1) The staff member is no longer posted within the inmate's unit;

(2) The staff member is no longer employed at the facility;

(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Broward Sheriff's Office; or

(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Broward Sheriff's Office

The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification memorandum. Three examples were reviewed by the auditor. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22), following an inmate's allegation they had been sexually abused by another inmate, Broward Sheriff's Office subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted related to sexual abuse within the facility; or Broward Sheriff's Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Allegation Notification form. Three examples were reviewed by the auditor. The agency investigated nine total PREA allegations including three sexual harassment and six sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (e) All such notifications or attempted notifications are documented on the Broward Sheriff's Office Inmate/Detainee PREA Notification form. Three examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.73 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22) outlines the agency's obligation to report under this standard terminates if the inmate is released from Broward Sheriff's Office's custody. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76	**Disciplinary sanctions for staff**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), documentation provided, and PREA Coordinator interview; the following delineates the audit findings regarding this standard. 115.76 (a) and (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) stipulates that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. The PREA Coordinator stated the Paul Rein Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were three allegations made against staff in the last twelve months; all three were dispositioned as UNFOUNDED. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.76 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that 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 PREA Coordinator stated the Paul Rein Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were three allegations made against staff in the last twelve months; all three were dispositioned as UNFOUNDED. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.76 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) mandates that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement unless the activity was clearly

	not criminal, and to any relevant licensing bodies. The PREA Coordinator stated the Paul Rein Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were three allegations made against staff in the last twelve months; all three were dispositioned as UNFOUNDED. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77	**Corrective action for contractors and volunteers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), the OAS documentation provided, Captain, and PREA Coordinator interviews; the following delineates the audit findings regarding this standard. 115.77 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and is reported to law enforcement unless the activity was clearly not criminal, and to relevant licensing bodies. During the past twelve months, there have not been any PREA incidents at the Paul Rein Detention Facility involving a contractor or volunteer. This was confirmed during interviews with the Captain and the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.77 (b) Broward Sheriff's Office takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During the past twelve months, there have not been any PREA incidents at the Paul Rein Detention Facility involving a contractor or volunteer. This was confirmed during interviews with the Facility Captain and the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based upon a review of the Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (pages 24-25), OAS documentation provided, agency head, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard: 115.78 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), policy states that inmates/detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse (detainee on detainee) or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's or detainee's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. During the past twelve months, there were two inmate-on-inmate sexual abuse allegations investigated at the Paul Rein Detention Facility; both allegations were investigated and determined to be unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that the disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. During the past twelve months, there were two inmate-on-inmate sexual abuse allegations investigated at the Paul Rein Detention Facility, both were investigated and determined to be unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (d) The Mental Health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Broward Sheriff's Office does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. During the past twelve months, there were two unsubstantiated inmate-on-inmate sexual abuse allegations investigated at the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (e) Broward Sheriff's Office disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. This was confirmed during an interview with the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.78 (f) The BCSO Policy 11.1 Prison Rape Elimination Act (page 25), states 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. During the past twelve months, there were two unsubstantiated inmate-on-inmate sexual abuse allegations investigated at the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (g) Broward Sheriff's Office prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81	**Medical and mental health screenings; history of sexual abuse**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on medical and mental health staff interviews, HCD-100_F-06 WellPath Response to Sexual Abuse-Broward FL Policy, and documentation provided; the following delineates the audit findings regarding this standard: 115.81 (a) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (b) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) page 10, and HCD-100_F-06 WellPath Response to Sexual Abuse-Broward FL Policy (page 5) mandates if the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Broward Sheriff's Office ensures the mate is offered a follow-up meeting with contracted mental health staff within 14 days of the intake screening as required by this part of the standard. The Classification Staff shall document the

	referral to the WellPath Mental Health Staff. A medical records review produced two such referrals. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (d) Broward Sheriff's Office requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. This was confirmed during two interviews with WellPath Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (e) Broward Sheriff's Office requires WellPath Medical and Mental Health Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility unless the inmate is under the age of 18. This was confirmed during an interview with the Health Services Administrator. During the past twelve months, there has not been a situation where consent from an inmate under the age of 18 has occurred for PREA purposes. This was confirmed during interviews with WellPath Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82	**Access to emergency medical and mental health services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, PREA Coordinator interview, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 23), Memorandum of Understanding with Nancy J. Cotterman Center (NJCC), and documentation provided; the following delineates the audit findings regarding this standard: 115.82 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 23), states that Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) to treat inmate victims of sexual abuse. The Paul Rein Detention Facility also has contracted WellPath medical and mental health staff at the facility ensuring inmates 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. This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (b) Broward Sheriff's Office has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. Victims will be assessed by Nancy J. Cotterman Center staff (NJCC). This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (c) The Paul Rein Detention Facility ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. This is done in cooperation with Nancy J. Cotterman Center (NJCC) and Central Florida Center against Sexual Abuse. This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (d) Broward County Policy 11.1 Prison Rape Elimination Act (page 23), states that Broward Sheriff's Office requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Broward County bares all cost. This was confirmed during two interviews with WellPath staff and by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83	**Ongoing medical and mental health care for sexual abuse victims and abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, WellPath HCD-100_F-06 Response to Sexual Abuse- Broward FL, Memorandum of Understanding with Nancy J. Cotterman Center, PREA Manager Interview, and OAS documentation provided; the following

	delineates the audit findings regarding this standard: 115.83 (a) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office to offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. This was confirmed during an interview with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (b) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office that the evaluations 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. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (c) Broward Sheriff's Office requires that contracted medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator and the PREA Manager at the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (d and e) Based on WellPath HCD-100_F-06 Response to Sexual Abuse-Broward FL (page 8), the policy requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC), and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (f) Broward Sheriff's Office requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County

	Sheriff’s Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (g) Broward Sheriff’s Office PREA Policy 11.1 Page 24 requires that medical and mental health staff provide treatment services to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff’s Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (h) The Paul Rein Detention facility is a jail and is exempt from this section of the standard.

115.86	**Sexual abuse incident reviews**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, Contracted Medical Staff Interview, the PREA Manager Interview, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, the Sexual Abuse or Assault Incident Review Form, Incident Tracking Log, and documentation provided; the following delineates the audit findings regarding this standard: 115.86 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that Broward Sheriff’s Office conducts a sexual abuse incident review after every sexual abuse investigation, including where the allegation has not been substantiated unless the allegation has been determined to be unfounded. This was confirmed during file review and during interviews with the Incident Review Team. The review is documented on the Bureau of Investigations and Projects Unit's PREA Review Meeting form. There were two investigations reviewed at the Paul Rein Detention Facility in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (b) Broward Sheriff’s Office ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the Investigations

	and Projects Unit's PREA Review Meeting form. There were two investigations reviewed at the Paul Rein Detention Facility in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (c) The review team consists of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit. There are typically 25-30 attendees at each incident review meeting. This was confirmed during interviews with contracted Medical Staff, PREA Coordinator, and the Paul Rein Detention Facility PREA Manager. All attendees are listed on the Investigations and Projects Unit PREA Review Meeting form. 115.86 (d) The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in Broward Sheriff's Office where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. There were two investigations reviewed at the Paul Rein Detention Facility in the past twelve months. The agency has deployed an detailed PREA after-action review form which addresses all elements of the standard. Therefore, this meets this portion of the standard. 115.86 (e) Broward Sheriff's Office shall implement the recommendations for improvement or shall document its reasons for not doing so. Each of the four 30-Day reviews marked recommendations as deemed appropriate by the Incident Review Team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87	**Data collection**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Managers, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings

	regarding this standard: 115.87 (a), (b) and (c) Broward Sheriff's Office 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 aggregates the incident-based sexual abuse data at least annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that the incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) stipulates the Broward Sheriff's Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (e) Broward Sheriff's Office does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (f) Upon request, Broward Sheriff's Office provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88	**Data review for corrective action**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Managers, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard:

	115.88 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) specifies that Broward Sheriff's Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Broward Sheriff's Office as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (b) Such reports include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the Broward Sheriff's Office's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (c) Broward Sheriff's Office's report is approved by the Sheriff and made readily available to the public through its website https://www.sheriff.org Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 25), states that Broward Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.89	**Data storage, publication, and destruction**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the Paul Rein Detention Facility PREA Manager, and the OAS documentation provided; the following delineates the audit findings regarding this standard: 115.89 (a) through (d) : Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy mandates Broward Sheriff's Office agency-wide PREA Coordinator to make all aggregated sexual abuse data, readily available to the public at least annually through the agency website https://www.sheriff.org. All reports are securely

	retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. The agency has an excellent software system for managing PREA-related statistics. This was confirmed during interviews with the agency-wide PREA Coordinator and the Paul Rein Detention Facility PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401	**Frequency and scope of audits**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.401 (a) and (b)The Paul Rein Detention Facility did have two PREA audits in 2018 and 2021. Both previous reports combined all four Broward County facilities into one PREA report that was submitted to the PREA Resource Center. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (h) The audit team has full access to all locations/areas of the Paul Rein Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (i) The auditor did obtain all necessary copies of audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (m) The audit team did conduct inmate interviews in a private setting. Before each interview, inmates were informed of: - their right to not speak to the audit team - a brief summary of the purpose of the PREA audit - the fact that the audit team would not ask any personal questions - the audit team background (including the team's independent contractor status) - the confidentiality requirements of the audit team and their name would not be in the facility's report - their right to be from retaliation for speaking to the audit team

	- how to report any such retaliation from speaking to the audit team - the availability of mental health staff if the conversation brought back bad memories or flashbacks from the past. 115.401 (n) The auditor did not receive any letters from inmates, staff, or third parties concerning the facility's PREA audit. Audit notices were observed in every housing unit; as well as all common areas. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.403	**Audit contents and findings**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 The Paul Rein Detention Facility has had PREA audits in 2018 and in 2021; the last report is posted on the agency's website https://www.sheriff.org. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	**Supervision and monitoring**	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	**Supervision and monitoring**	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	**Supervision and monitoring**	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	**Youthful inmates**	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (b)	**Youthful inmates**	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (c)	**Youthful inmates**	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.15 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate’s genital status?	yes
	If an inmate’s genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	**Limits to cross-gender viewing and searches**	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	**Hiring and promotion decisions**	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	**Upgrades to facilities and technologies**	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	**Policies to ensure referrals of allegations for investigations**	

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	**Employee training**	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	**Employee training**	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	**Volunteer and contractor training**	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	**Volunteer and contractor training**	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	**Inmate education**	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	**Inmate education**	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	**Inmate education**	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	**Specialized training: Investigations**	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	**Staff and agency reporting duties**	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	**Staff and agency reporting duties**	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators?	yes
115.62 (a)	**Agency protection duties**	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	**Reporting to other confinement facilities**	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	**Staff first responder duties**	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	**Preservation of ability to protect inmates from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	**Reporting to inmates**	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	**Reporting to inmates**	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	**Disciplinary sanctions for inmates**	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	**Disciplinary sanctions for inmates**	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	**Disciplinary sanctions for inmates**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	**Disciplinary sanctions for inmates**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	**Disciplinary sanctions for inmates**	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	**Disciplinary sanctions for inmates**	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	**Disciplinary sanctions for inmates**	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
115.81 (b)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

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

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	**Data collection**	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	**Data review for corrective action**	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	

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

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes

PREA Facility Audit Report: Final

Name of Facility: North Broward Detention Facility
Facility Type: Prison / Jail
Date Interim Report Submitted: 06/01/2024
Date Final Report Submitted: 10/01/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Brian D. Bivens	**Date of Signature:** 10/01/2024

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	04/15/2024
End Date of On-Site Audit:	04/19/2024

FACILITY INFORMATION	
Facility name:	North Broward Detention Facility
Facility physical address:	1550 Northwest 30th Avenue, Pompano Beach, Florida - 33069
Facility mailing address:	

Primary Contact

Name:	Captain Kerwin Hankerson
Email Address:	kerwin_hankerson@sheriff.org
Telephone Number:	954-831-6781

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Facility PREA Compliance Manager	
Name:	Anthony Kidd
Email Address:	anthony_kidd@sheriff.org
Telephone Number:	O: 7865062585

Facility Health Service Administrator On-site	
Name:	Ebony Young
Email Address:	EbYoung@Wellpath.us
Telephone Number:	954-831-3509

Facility Characteristics	
Designed facility capacity:	1206
Current population of facility:	724
Average daily population for the past 12 months:	755
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males

Age range of population:	16-91
Facility security levels/inmate custody levels:	Minimum/Medium/Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	305
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	398
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	171

AGENCY INFORMATION	
Name of agency:	Broward County Sherriff's Office
Governing authority or parent agency (if applicable):	Broward County
Physical Address:	2601 West Broward Boulevard, Fort Lauderdale, Florida - 33312
Mailing Address:	2601 West Broward Boulevard, Fort Lauderdale,
Telephone number:	9542687843

Agency Chief Executive Officer Information:	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Agency-Wide PREA Coordinator Information			
Name:	Joseph Lungha	**Email Address:**	joseph_lungha@sheriff.org

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
4	• 115.15 - Limits to cross-gender viewing and searches • 115.17 - Hiring and promotion decisions • 115.51 - Inmate reporting • 115.65 - Coordinated response
Number of standards met:	
41	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-04-15
2. End date of the onsite portion of the audit:	2024-04-19

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Nancy J. Cotterman Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1547
15. Average daily population for the past 12 months:	1124
16. Number of inmate/resident/detainee housing units:	68
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	(●) Yes ( ) No ( ) Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	735
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
38. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	1
40. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
41. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	2
42. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	7

43. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2
44. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	2
46. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	1
47. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The facility does not maintain accurate statistical information for questions 37-47.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	728

50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	309
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	171
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The numbers for questions 49-51 reflect the total number of all facilities. The majority of the contract staff are Trinity Kitchen Staff and WellPath medical and mental health employees. The numbers for volunteers and contract employees reflect the agency totals for all four detention facilities.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	13
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☑ Age ☑ Race ☑ Ethnicity (e.g., Hispanic, Non-Hispanic) ☑ Length of time in the facility ☑ Housing assignment ☐ Gender ☐ Other ☐ None

55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Random inmates were selected by the audit team utilizing the facility offender rosters.
56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	(●) Yes ( ) No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	The audit team conducted interviews in a private setting at each floor of the facility. Each inmate was advised of: - the fact that they did not have to speak to the audit team - the confidentiality of the conversation - out to report any type of retaliation for speaking to the auditor - the fact the audit team would not ask about their personal experiences - the fact that if the conversation brought of bad memories or flashbacks from their past, the audit team would ensure they get to speak to a mental health professional.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	17

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/ resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/ residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees. ☐ The inmates/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ detainees).	There were no juveniles housed at the facility during the onsite portion of the audit.
60. Enter the total number of interviews conducted with inmates/residents/ detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According the PREA Coordinator and Facility Administration, there were no inmates housed in the facility for this category during the onsite portion of the audit.

61. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
62. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	2
63. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	2
64. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	7
65. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
66. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According the PREA Coordinator and Facility Administration, there were no inmates housed in the facility for this category during the onsite portion of the audit.
67. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	2
68. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	1
69. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According the PREA Coordinator and Facility Administration, there were no inmates housed in the facility for this category during the onsite portion of the audit.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	he audit team conducted interviews in a private setting at each floor of the facility. Each inmate was advised of: - the fact that they did not have to speak to the audit team - the confidentiality of the conversation - out to report any type of retaliation for speaking to the auditor - the fact the audit team would not ask about their personal experiences - the fact that if the conversation brought of bad memories or flashbacks from their past, the audit team would ensure they get to speak to a mental health professional.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	12

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☑ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No
74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	During the tour and throughout the site visit, the auditor randomly selected staff for random staff interviews. Interviews were conducted on various areas the facility in private settings. There were no barriers to conducting Statt interviews. All interviews were conducted in a private setting.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	18
76. Were you able to interview the Agency Head?	○ Yes ◉ No
a. Explain why it was not possible to interview the Agency Head:	The facility administrator was interviewed as the designee.

77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
78. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No
79. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☑ Agency contract administrator ☑ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☑ Line staff who supervise youthful inmates (if applicable) ☐ Education and program staff who work with youthful inmates (if applicable) ☑ Medical staff ☑ Mental health staff ☑ Non-medical staff involved in cross-gender strip or visual searches ☑ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☑ Investigative staff responsible for conducting administrative investigations ☑ Investigative staff responsible for conducting criminal investigations ☑ Staff who perform screening for risk of victimization and abusiveness ☑ Staff who supervise inmates in segregated housing/residents in isolation ☑ Staff on the sexual abuse incident review team ☑ Designated staff member charged with monitoring retaliation ☑ First responders, both security and non-security staff ☐ Intake staff

	☐ Other
81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	8
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	■ Education/programming ☐ Medical/dental ☐ Mental health/counseling ■ Religious ☐ Other
82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	7
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ■ Medical/dental ■ Food service ☐ Maintenance/construction ☐ Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	The lead auditor also interviewed random WellPath Medical Staff and Trinity Staff.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	The lead auditor reviewed the following files: Fifteen PREA investigation files Twenty inmate files plus ten additional files to clarify some inconsistencies with inmate interviews. Fifteen Employee Human Resource and Training Files Eight Contract Employee Records Five Volunteer Training Records Random video footage showing inmates were given PREA Cards during the Intake Process in Central Booking

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No
91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	There were no barriers in documentation review.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	1	0	0	1
Total	1	0	0	1

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	4	0	4	0
Staff-on-inmate sexual harassment	3	0	3	0
Total	7	0	7	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	3	0
Staff-on-inmate sexual harassment	0	0	3	0
Total	0	1	6	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	1

99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	7
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	4
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	( ) Yes (●) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ◉ No ○ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	A total of eight PREA investitive files were reviewed.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

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

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the documentation provided: as well as Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-2, Broward County Sheriff's Office Organization Chart, the auditor's observation, and interviews with the Agency-wide PREA Coordinator, and the North Broward Detention Facility PREA Manager, it was determined the North Broward Detention Facility delineates compliance with Standard 115.11. 115.11 (a) The North Broward Detention Facility staff follows the agency's policy, Policy 11.1 Prison Rape Elimination Act (PREA) pages 4-26 which mandates zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. The auditor observed PREA information posted in each housing unit and in many common areas. Inmates are given PREA information upon intake at the North Broward Detention Facility. This information is also given to each inmate when they are transferred to any of the Broward County Sheriff's Office facilities. Records review

	clearly showed that all staff, contract staff, and volunteers are trained on the agency's zero-tolerance policy against sexual abuse and sexual assault Informal conversations throughout the onsite process with both random staff and random inmates reviewed that the agency's PREA policy and processes are significantly embedded into the culture of the North Broward Detention Facility. Informal conversations with staff and inmates at the North Broward Detention Facility confirmed the facility has institutionalized the agency's zero-tolerance policy for sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.11 (b) and (c) The agency employs an upper-level, agency-wide PREA Coordinator. The organization chart provided to the auditor shows the PREA Coordinator is an Executive Lieutenant and is an upper-level staff member with at least one PREA Manager at each of the four facilities. Lt. Lungha was appointed as the agency wide PREA Coordinator. Lt. Lungha oversees the PREA process at the Mail Jail, the North Broward Facility, the North Broward Bureau, and the Joseph V. Conte Facility. Lt. Lungha reports directly to Major Kevin Corbett. Lt. Lungha is very knowledgeable of the PREA standards and actively assists the facility with compliance. Lt. Lungha has the authority to develop, implement, and oversee PREA compliance. He is actively updating the facility as new Frequently Ask Questions (FAQs) results are published on the PREA Resource Center website. The Broward County Sheriff appointed Executive Lieutenant Anthony Kidd to the position of PREA Manager at the North Broward Detention Facility. During interviews with the PREA Coordinator and the PREA Compliance Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The North Broward Detention Facility meets this standard due to the fact it employs an agency-wide PREA Coordinator and a PREA Compliance Manager for each of the four facilities. Therefore, this standard was found to comply with this audit.

115.12	**Contracting with other entities for the confinement of inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.12 Based on the documentation provided: as well as, auditor observations, and interviews with the random staff, PREA Coordinator, and the North Broward Detention Facility PREA Manager, it was determined the North Broward Detention Facility does not contract with other facilities to house inmates assigned to their custody. The Broward County Sheriff's Office does not contract with other agencies for the confinement of those in their custody. Therefore, this standard was found to comply with this audit.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on staff interviews, review of documentation provided, and review of the North Broward Detention Facility staffing analysis (February 1, 2024), Policy 11.1 Prison Rape Elimination Act (PREA), and Policy 4.1 Facility/cell inspections, auditor observations, interviews with twelve random staff, formal and informal inmate interviews, observations checks, and security rounds: the following delineates the audit findings regarding this standard: 115.13 (a) The facility has documented and made its best efforts to comply regularly with a 12-page staffing plan that provides for adequate levels of staffing as described and required by this standard; the established staffing plan uses the criteria found in standard 115.13 (a) 1. Generally Accepted Detention and Corrections Practices 2. Findings of Inadequacy: a. Judicial b. Federal Investigative Agencies c. Internal or External Oversight Bodies d. Applicable State and Local Laws, Regulations, or Standards 3. Facility Overviews a. Components of Physical Plant b. Composition of the Inmate Population c. Number and Placement of Supervisory Staff d. Institutional Programs and Schedule e. Prevalence of Substantiated and Unsubstantiated PREA Allegations f. Recommendations and Initiatives Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. There have not been any judicial findings of inadequacy in the past twelve months. During the onsite portion of the audit, the auditor did observe: - the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift - staff line of sight and assess whether there are blind spots - areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored - the level of supervision and frequency of cell checks in housing areas - indirect supervision practices, including camera placement

	No concerns were noted during the tour. Staffing levels in the Broward County Sheriff's Office staffing plan are agreed upon through an annual review process with all bargaining units. Both formal and informal inmate interviews produced consistent and positive responses on the staffing levels in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on the shift roster and submitted to the North Broward Detention Facility PREA Manager outlining the reason(s) for the deviation. There has not been any deviation reported where the staffing plan had not been complied with in the past twelve months, as confirmed by written documentation and during an interview with the North Broward Detention Facility PREA Manager. Twelve random staff confirmed they work overtime when there is a deviation at any of the four facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Major for review. It is then forwarded to Sheriff Tony with any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The annual staffing plan is also reviewed by the Federation of Public Employees. The last Annual Staffing Plan assessment was completed on February 1, 2024. The next scheduled review date is February 2025. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.13 (d) Based on North Broward Detention Facility Shift Supervisor interviews, facility JMS logs, staff interviews, and policy 4.1 Facility/cell inspections, observation checks, and security rounds, Intermediate-level or higher-level supervisors (Sergeant and Lieutenants) are required to conduct and document unannounced rounds on all shifts as require. Cheick were reviewed for the following dates: May 25-26, 2024 September 6-8, 2024 April 2-3, 2024 A random documentation review showed within a 72-hour period; more than a dozen unannounced rounds were conducted in each facility. Such rounds are logged in the Jail Management System (JMS) inmate management software system. This was confirmed during an interview with a Lieutenant at the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the auditor observation, documentation provided, 11.33 Secure Custody of Juveniles and Reporting Requirements, 11.1 Prison Rape Elimination Act (PREA), Classification Housing, Work and Programs Plan, interviews with the PREA Coordinator, PREA Manager, and staff interviews, and auditor observations: the following delineates this standard: 115.14 (a) Broward County policy 11.1 Prison Rape Elimination Act (PREA) states that youthful detainees will be separated at all times during the intake process and housing. Such detainees will be supervised under direct supervision guidelines. 11.33 Secure Custody of Juveniles and Reporting Requirements policy states such detainees will be separated by sight, sound, and physical contact with the adult inmate/ detainee population. Females are housed at North Broward and male juveniles are housed at Paul Rein Detention Facility. This was verified during interviews with eight youthful detainees and observations by the auditors during the outside visit. The juvenile housing unit was spacious in size and had an adjacent classroom and recreation area. Main services are brought the juvenile unit, including medical, mental health, food service, and programing. There were no female youthful offenders housed at the facility during the onsite portion of the audit. This was confirmed by the North Broward PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.14 (b) Broward County policy 11.1 Prison Rape Elimination Act (PREA) states that youthful detainees will be separated at all times during the intake process and housing. Such detainees will be supervised under direct supervision guidelines. 11.33 Secure Custody of Juveniles and Reporting Requirements policy states such youthful inmates/detainees will be separated by sight, sound, and physical contact with the adult inmate/detainee population. All new inmates are processed at the Main Jail, female youthful offenders are then transported to the North Broward Facility. This was confirmed by the PREA Coordinator. The North Broward Detention Facility Housing Plan outlines the daily activities of youthful inmates, including education services and recreation times. The auditor reviewed the daily activity schedule for the youthful inmates. The juvenile housing unit was spacious in size and had an adjacent classroom and recreation area. Main services are brought the juvenile unit, including medical, mental health, food service, and programing. There were no female youthful offenders housed at the facility during the onsite portion of the audit. This was confirmed by the PREA Manager. Female youthful offenders are housed at North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), training curriculums, staff interviews, training file reviews, SOP 5.9 Inmate-Facility Searches and Disposition of Contraband, and documentation provided; the following delineates the audit findings regarding this standard: 115.15 (a) Broward County SOP 5.9 Inmate-Facility Searches and Disposition of Evidence (page 12) outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed that cross-gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. According to the PREA Coordinator, there have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. This was reiterated during an interview with the North Broward Detention Facility PREA Manager. During the tour, the auditor did: - observe areas used to conduct strip searches, visual body cavity searches, and pat-down searches and assess whether opposite-gender staff - conducted informal conversations with staff and persons confined in the facility regarding search procedures The auditor did not note is issues during the tour. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) and prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. This practice was confirmed during female inmate interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) prohibits frisk/pat searches of female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. If a search is completed under exigent circumstances, the search is documented in the Jail Management System. There were no reported searches completed under exigent circumstances in the past twelve months. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82,

Statement of Search Preference. This practice was confirmed during female inmate interviews. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without a non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets, and changing their clothes. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) also require staff of the opposite gender to announce their presence before entering the housing units. During the tour, the auditor did:

- observe areas where confined persons may be in a state of undress, such as showering, using the toilet, and/or changing their clothes.

- observe if any nonmedical staff of the opposite gender can view confined persons in a state of undress, including from different angles and via mirror placement.

- observe electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of confined persons

- observe the method(s) used to alert individuals confined in the facility that an opposite-gender staff person has entered a housing unit/area where they are likely to be in a state of undress

- conducted informal conversations with staff regarding cross-gender viewing, including camera monitoring staff

- conducted informal conversations with inmates regarding knock and announce practices of the staff

There were no significant issues noted. Inmate and staff interviews revealed that opposite-gender announcements were common practice at this facility and reminders of this requirement are posted on the entry doors of all housing units exceeding the requirements of this part of the standard during this audit. Therefore, the facility exceeds this section of the standard.

115.15 (e) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13), the training curriculum provided, and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. If the inmate’s genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination

	conducted in private by a medical practitioner. This was corroborated during interviews with a LBGTI inmate and random staff. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 6), training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This is outlined in Broward County Sheriff's Office roll call training SOP 11.1 and the BCSO Lesson Plan. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. During an interview with a LBGTI inmate, it was confirmed that the inmates felt the staff conducted proper searches. There were also no complaints filed by the LBGTI inmates at the North Broward Detention Facility in the past twelve months related to searches. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16	**Inmates with disabilities and inmates who are limited English proficient**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practice, review of the lesson plans, and review of WellPath Language Interpreter Services, ERO Sign Language interpretation Services, invoices, as well as staff and inmate interviews and facility tour; the following delineates the audit findings regarding this standard: 115.16 (a) The North Broward Detention Facility takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through WellPath with the Language Line Services. The facility also makes available TDD phones at each facility. The facility has a significant number of bi-lingual employees to assist with

	interpreter needs. During five interviews with the inmates identified to meet the aspects of this standard (two deaf/hearing impaired, two blind/low vision, one cognitive), they all confirmed having received training and materials they could understand. The inmates and staff also confirmed that the Language Line is available when needed. The auditor was provided with invoices and payments for Language Line Services. There seven limited-English proficient inmates interviewed during the onsite visit. All seven LEP targeted inmates displayed a solid working knowledge of the agency's zero tolerance for sexual abuse and sexual harassment, and all were able to list the internal and external reporting mechanisms that the facility provides. During the onsite portion of the audit, the auditor: - Tested the facility's process for securing interpretation services - Determined if inmates must self-identify to gain the services - Assessed the availability of interpretation services - Observed the location of interpretation services There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (b) The Broward Sheriff's Office takes 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, including steps to provide interpreters who can interpret effectively accurately and impartially. Language Line interpreter services and/or staff interpreters are used to translate at this facility. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through WellPath with the Language Line Services. There were seven limited-English inmates interviewed (with the assistance of a staff interpreter) during the on-site visit and they confirmed during interviews receiving all written PREA information and viewing the Spanish and/or Creole version of the PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. The facility also makes TDD phones in each facility. Both hearing impaired inmates interviewed displayed a working knowledge of how to report PREA allegations. The North Broward Detention Facility has a large number of bi-lingual employees to assist with interpreter services. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9)) outlines these practices. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9) illustrates the facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. PREA handouts, PREA posters, PREA education video, and the Inmate Handbook are

	provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through WellPath with the Language Line Services. This was confirmed during interviews with First Responders, the North Broward Detention Facility PREA Manager, and the PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 4 and 5), Human Resource staff interviews, BSO DJ# 194 PREA Questionnaire, and fifteen staff personnel file reviews; Sheriff's Policy Manual 2.1 Employee Standards of Conduct, the following delineates the audit findings regarding this standard: 115.17 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 4-5) outlines that Broward Sheriff's Office does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer 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, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The facility completes thorough background checks on all applicants as well as a background check is completed on all new applicants confirming compliance. Staff have been trained on the agency's DJ# 194 PREA Questionnaire. The Agency has fourteen trained background investigators. Background investigations include combination of the following dependent upon hire dates of the new hires: : Florida Law Enforcement Division NCIC BSO CAD BSO Records BSO Warrants Surrounding Jurisdictions

Reference Checks

Interpol

Prior Employers

Military History

Some employee human resource files selected for review were employees with decades of service to the organization. The background process had change throughout three decades.This practice was confirmed during interviews with the agency's Human Resource Director and the PREA Investigator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Broward Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer, who may have contact with inmates. This was confirmed during the review of ten agency-wide human resource files for contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 The Broward Sheriff's Office requires a criminal background record check to be completed before hiring any new employee. Fifteen out of fifteen Human Resource files confirmed this practice. The agency has fourteen trained background investigators.

Background investigations include a combination of the following dependent upon hire dates of the new hires:

Florida Law Enforcement Division

NCIC

BSO CAD

BSO Records

BSO Warrants

Surrounding Jurisdictions

Reference Checks

Interpol

Prior Employers

Military History

Some employee human resource files selected for review were employees with decades of service to the organization. The background process had change throughout three decades. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 Broward Sheriff's Office makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. The agency has fourteen Background Investigators. A review of fifteen Human Resource files illustrated this practice. Two applicants had previously worked at a prior institution; both times, the Background Investigator had sent and received the prior documentation from the previous employer. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) Broward Sheriff's Office requires a criminal background record check to be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Ten out of ten agency-wide WellPath (contracted Medical/ Mental Health) and Trinity (contracted Food Service) files reviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) Broward Sheriff's Office completes background checks every five years. There is an extensive tracking system in place to monitor the process. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) outlines the requirements. The facility has enrolled in the NCIC program RapBack; the program provides designated administrative staff with arrest information of staff members. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Broward Sheriff's Office instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. Each subsequent year of employment, employees are required to sign the agency's Policy Manual page three of the Sheriff's Policy Manual informs staff they are under Broward County Sheriff's Office colors while not on duty; specifically, when working for another employer. File review showed that fifteen out of fifteen files contained a signed acknowledgment of this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.17 (g) Broward County Sheriff's Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. The PREA Coordinator stated there have not been any terminations of a contract employee for this circumstance in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (h) Broward County Sheriff's Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The PREA Coordinator stated the agency has not received such a request in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon BJA FY 2022 Implementing the PREA Standards, Protecting People Who are Incarcerated, and Safeguarding Communities 15PBJA-22-GG-01653-PREA, review of Broward Sheriff’s Office physical plant, Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews and review of OAS documentation provided; the following delineates the audit findings regarding this standard: 115.18 (a) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse. During this audit cycle, The Broward Sheriff’s Office Department of Detention has been awarded the Implementing the PREA Standards, Protecting People Who are Incarcerated, and Safeguarding Communities grant from the Department of Justice, Office of Justice Programs that will pass through Broward County. The grant amount is $250,000 to be used to fund one new Accountability Specialist position FTE salary and fringe, attending training/conferences, purchasing PREA-related equipment, and funding over time. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.18 (b) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. During this audit cycle, there were substantial enhancements to the video technology at the North Broward Detention Facility. All identified blind spots were addressed and staff as well as inmates/detainees confirmed during interviews they felt safer with the changes in place. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21	**Evidence protocol and forensic medical examinations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), investigative staff interviews, Facility Captain interview, 05-10-01 Sexual Misconduct Battery Intervention and Response Procedures, and review of OAS documentation provided; this delineates the audit findings regarding this standard: 115.21 (a) and (b) Broward Sheriff's Office complies with all elements of this standard. Documented in Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20); the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. Broward Sheriff's Office conducts its own PREA criminal investigations. The Broward County Sheriff's Office investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the Broward County Sheriff's Office Bureau of Investigations and Projects investigators on each case. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (c) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. During the past twelve months, there has not been any inmate who alleged sexual abuse that constituted the need for a SANE exam. An interview with the Facility Captain

	confirmed this practice. The facility investigated five sexual abuse allegations; one was deemed to be unfounded and four were classified as unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (d) The Broward Sheriff's Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020) which agrees to provide outside victim advocacy services to the inmates. The services of these victim advocates have not been requested or used by the inmates during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (e) Broward Sheriff's Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020); which agrees to provide outside victim advocacy services to the inmates upon request. Interviews with the agency-wide PREA Coordinator and three agency PREA investigators confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (f) The Broward Sheriff's Office is responsible for administrative investigations and criminal investigators with the Broward County Sheriff's Office shall conduct all criminal investigations covering all aspects of this standard. Broward Sheriff's Office conducts its own PREA criminal investigations. This was confirmed during an interview with the PREA Coordinator and during the review of all nine PREA investigation (five sexual abuse and three sexual harassment) files from the past twelve months from the North Broward Detention Facility. Therefore, this part of the standard is not applicable to this facility. 115.21 (g) The Broward Sheriff's Office is exempt from this section because the Broward County Sheriff's Office conducts its own PREA criminal investigations. 115.21 (h) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Nancy J. Cotterman Center (NJCC) also supplies victim advocates upon request for the victims of sexual abuse. This was confirmed during an interview with WellPath contracted medical and mental health staff members. Therefore, this part of the standard is not applicable to this facility.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 19-20) investigative staff interviews, PREA Coordinator Interview, Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC), review of five sexual assault investigation files, and review of OAS documentation provided; the following delineates the audit findings regarding this standard: 115.22 (a) The Broward Sheriff's Office is required to investigate all PREA complaints received at this facility. Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). All potential criminal activity is referred to the Broward County Sheriff's Office PREA Investigator assigned to the North Broward Detention Facility. There were five cases of sexual abuse referred and investigated during this audit cycle. One case was unfounded and four were deemed as unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (b) All PREA allegations are investigated by the Broward Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Broward County Sheriff's Office PREA Investigator for criminal investigation and prosecution as warranted. Five sexual assault investigation files were reviewed, none of the file rose to the level of prosecution. This was confirmed during an interview with the PREA Coordinator. This policy is published on the agency website https.//www.Broward County.com/the-prison-rape-elimination-act-of-2003-prea as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (c) The Broward Sheriff's Office refers all criminal allegations for the investigation to the designated Broward County Sheriff's Office PREA investigators. This was confirmed during an interview with the PREA Coordinator. The requirements of this part of the standard are outlined in the policy that is posted on the website https.//www.Broward County.com/the-prison-rape-elimination-act-of-2003-prea. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31	Employee training
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Based on the review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) staff interviews, twelve random staff interviews, fifteen random staff training file review, review of OAS documentation provided the BSCO 19-page PREA Training Lesson Plan, PREA Roll-Call SOP 11.1 PREA, sign-in sheets, signed acknowledgment forms, training curriculums, and employee handouts); the following delineates the audit findings regarding this standard: 115.31 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) requires Broward Sheriff's Office to train all their employees who have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' right to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (b) The training is tailored to both the male and female gender of the inmates at Broward Sheriff's Office; this is done because staff may transfer to any of the four agency facilities. This was confirmed after reviewing the 19-page PREA training lesson plan and an interview with the Training Staff. Twelve out of twelve random staff interviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receive annual refresher PREA training during in-service according to policy 11.1 which meets the requirements of this standard. Quarterly roll-call training is conducted quarterly at the North Broward Detention Facility. A review of fifteen employee training files illustrated that all fifteen were found to comply with the policy. Formal and informal staff interviews revealed that staff were well-trained in

	the agency's zero tolerance policy and how to respond to sexual abuse allegations. Therefore, the facility meets this part of the standard during this audit. 115.31 (d) Broward Sheriff's Office documents, through employee examination on Broward County PREA Policy, demonstrating all employees understand the training they have received. Fifteen out of fifteen training file reviews confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32	**Volunteer and contractor training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7), eight volunteer and ten contractor interviews, random training file review and review of OAS documentation provided, Civilian Security PREA Orientation Packet, sign-in sheets, signed acknowledgment forms, training curriculums, and handouts; the following delineates the audit findings regarding this standard: 115.32 (a) Broward Sheriff's Office ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Broward Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Broward County Sheriff's Office Civilian Security PREA Orientation Packet outlines the training given to all volunteers and contractors. Interviews with ten agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. Signature on the Broward County PREA Policy Acknowledgment and/or Broward County Sheriff's Office Training Roster acknowledges each volunteer and contractor has received and understands the PREA training provided. Contract employee and volunteer file review confirmed this practice. Multiple interviews with contract employees revealed they receive annual training at a minimum. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (b) The level and type of training provided to volunteers and contractors are based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Broward County's zero-tolerance policy regarding sexual abuse and sexual harassment and their requirements to report such incidents. Interviews with ten

	agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (c) Broward Sheriff's Office documents through signature on the Broward Training Roster, that volunteers and contractors understand the training they have received. Interviews with ten agency-wide contract employees (WellPath and Trinity) and eight agency-wide volunteers confirmed they had been properly trained. A review of training records also confirmed the training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33	**Inmate education**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8), nine targeted inmate interviews, twenty random selected inmate records, the Inmate Handbook (multiple languages), random booking video reviews, additional signed Facility Property receipts, PREA Information Card, Facility Orientation, PREA Posters, and the BCSO PREA video; as well as interviews with random inmates and staff; the following delineates the audit findings regarding this standard: 115.33 (a) During the intake process at Central Booking at the Main Jail, inmates receive information explaining Broward Sheriff's Office's zero-tolerance policy (Broward County Policy 11.1 Prison Rape Elimination Act (PREA)) regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates sign the Facility Property receipt for the Inmate Handbook containing PREA information which is available in English, Creole, and Spanish. Several inmates interviewed initially stated they did not remember signing for and receiving the Inmate Handbook. Signed Property receipts were proved for ten inmates. Additional informal inmate interviews were conducted and video surveillance of ten inmates was reviewed showing the inmates in the intake are of the Mail Jail receiving the PREA Information. All activities for each inmate are electronically stored on their JMS Contact Log, including receipt of the PREA Information in booking, their initial PREA Screening, their 30-day reassessment, their PREA comprehensive education. This was confirmed during an interview with the Classification Staff. During the onsite portion of the audit, the auditor did: - How the facility provides the necessary PREA information to all inmates at each

BCSO facility

- Confirm who is responsible for conducting the intake process
- Confirm interpreter services, including location and how to access the service
- Reviewed the PREA education deployment methods for inmates with disabilities
- Held informal conversations with staff and inmates concerning the PREA education process

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Recommendations:

- The agency has agreed to work with their kiosk vendor to create an electronic acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment.

- The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process.

- The agency should explore the utilization of electronic signature pads to their JMS system.

115.33 (b) Within 30 days of intake, Broward Sheriff’s Office provides comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The additional education is provided in the form of a video (both English, Creole, and Spanish). on the second floor at the Mail Jail during orientation. The video was created by the Broward County Sheriff's Office This practice is outlined in the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8). There were several inmates who did not remember if they had watched the PREA orientation video utilized for the more in-depth training. The agency provided the JMS contact card for ten inmates showing they had watched the video. Additional informal inmate interviews were conducted. All activities for each inmate are electronically stored on their JMS Contact Log, including receipt of the PREA Information in booking, their initial PREA Screening, their 30-day reassessment, their PREA comprehensive education. The agency is in the process of requiring inmates to electronically acknowledge the viewing of the PREA video. The agency is also in the process providing the PREA video on the inmate tablets. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act

	(PREA) (page 8) mandates that Broward Sheriff's Office provides such education within one year of the effective date of the PREA standards to all its inmates and provides education to inmates upon transfer as required by this standard. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (d) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with WellPath Language Services. PREA handouts, PREA posters, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The facility also makes available a TDD phone at each facility. All inmates with disabilities hat were interviewed (two blind/ low vision, two deaf/hearing impaired, and one cognitive) were able to understand the auditor during the interview, and both displayed a working knowledge of the agency's zero-tolerance against sexual abuse and sexual harassment and were able to list the internal and external modes of reporting. Seven limited English proficient inmates had documentation in their intake file showing they all had received a PREA Brochure, properly screened, and watched the PREA education video. All seven LEP inmates stated they felt safe in the facility. Twenty random inmate records reviewed all twenty inmates signed for initial PREA information upon intake. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (e) There was documentation provided of inmates' participation in PREA educational sessions as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.33 (f) The Broward Sheriff's Office does provide the inmates with posters, PREA card and an inmate handbook in English, Creole, and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates/detainees are given the PREA Card. The audit team reviewed random booking videos showing inmate receiving the PREA cards during the intake process. The agency has "Zero Tolerance" Posters located in all common areas of the facility. Records review showed that LEP inmates received education information in a Spanish format; all seven LEP inmates stated they felt safe in the facility. During the onsite portion of the audit, the auditor: - observed whether signage throughout the facility can be easily read/accessed by persons in the facility - observed if the signage was clear and easy to understand

	- observed if the signage was in multiple languages - observed the text size, formatting, and physical placement of the signage - observed if the signage was obscured or unreadable due to damage or graffiti -observed whether the information on the signage was accurate and consistent throughout the facility - held informal conversations with staff and inmates concerning the signage Auditor Recommendations: - The agency has agreed to work with their kiosk vendor to create an electronic acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment. - The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process. - The agency should explore the utilization of electronic signature pads to their JMS system. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34	**Specialized training: Investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices as well as, Policy 11.1 Prison Rape Elimination Act (PREA) page 7, Moss Group Training Certificates, Investigators training file review, and three investigative staff interviews; the following delineates the audit findings regarding this standard: 115.34 (a) In addition to the general training provided to all employees Broward Sheriff's Office ensures that the PREA Administrative Investigators receive training in conducting investigations in confinement settings. This was confirmed during a review of the Investigation's training records. The Broward County Sheriff's Office conducts all PREA criminal investigations. Investigators have specialized training for sexual assault in a confinement setting. The training was conducted by the Moss Group. The course curriculum is divided into six one-hour sessions. The agency has thirteen PREA criminal investigators PREA administrative investigators. The auditor

	found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. The auditor did review the training curriculum and training certificates from the Moss Group. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The training was conducted by the Moss Group. The auditor did review the training curriculum and training certificates from the Moss Group. The course curriculum is divided into six one-hour sessions. The agency has thirteen PREA criminal investigators PREA administrative investigators. The auditor found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (c) Broward Sheriff's Office maintains documentation that Broward County Sheriff's Office investigators have completed the required specialized training in conducting sexual abuse investigations. Broward County Sheriff's Office requires investigators to have specialized training for sexual assault in a confinement setting. The training was conducted by the Moss Group. The auditor did review the training curriculum and training certificates from the Moss Group. The course curriculum is divided into six one-hour sessions. The auditor found the three PREA Investigators to be very knowledgeable and well-versed in the PREA standards as they pertain to investigations and evidentially standards. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices, as well as the WellPath HCD-100_F-06 Response to Sexual Abuse Broward County Lesson Plan, PREA Specialized Medical/Mental Health training records, WellPath training file review, and staff interviews; the following delineates the audit findings regarding this standard:

	115.35 (a) Broward County Sheriff's Office utilized the services of WellPath, a contracted medical and mental health service provider. Broward County provides PREA Specialized Medical/Mental Health training video, curriculum provided, and training file Broward Sheriff's Office review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. WellPath HCD-100_F-06 Response to Sexual Abuse Broward County Lesson Plan (page 6) outlines this policy. A review of four training records and interviews with four agency-wide contracted WellPath Medical Staff members confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (b) The medical staff at this facility does not conduct forensic exams. This was confirmed during interviews with the WellPath Medical Staff and the PREA Coordinator. Broward Sheriff's Office has a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) for SANE/SAFE examinations. Therefore, this part of the standard does not apply to this facility. 115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. The training is an online course entitled; PREA Specialty Training for Medical and Mental Health Staff. A review of four training records and interviews with four agency-wide WellPath staff members confirmed this practice. Multiple training sign-in sheets were provided to the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (d) Medical and mental health care practitioners with WellPath also receive the annual training mandated for all employees, contractors, and volunteers. A review of four training records and interviews with four agency-wide WellPath staff members confirmed this practice. All medical staff interviewed were found to have a working knowledge on how to respond to sexual assault allegations, mandatory reporting policies, and victim advocacy services available to the inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41	**Screening for risk of victimization and abusiveness**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-11), inmate and staff interviews, twenty inmate file reviews, BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy, and a review of the Broward Sheriff's Office Sexual Abuse Screening Tool 11.1B; the following delineates the audit findings regarding this standard: 115.41 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) and the BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates that Broward Sheriff's Office ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Random inmate interviews confirmed this practice. Inmates sign a facility property receipt, indicating they have received the Inmate Handbook. Some inmates interviewed stated they did not remember receiving a PREA Card upon intake. Main Jail Intake videos were reviewed. All ten videos clearing showing inmates walking around the intake area with the PREA Card in their possession. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. The Handbook outlines basic information on the topics of sexual assault and sexual harassment, the agency's zero tolerance, reporting procedures, and the victim advocacy support available. During the onsite portion of the audit, the auditor: - confirmed that Classification Staff are responsible for risk screenings - assessed whether the screening process occurs in a setting that ensures as much privacy as possible - assessed whether screening staff asked screening questions in a manner that fosters comfort and elicits responses - held informal conversations with staff conducting the risk screening Auditor Recommendations: - The agency has agreed to work with their kiosk vendor to create an electronic acknowledgment of the Inmate Handbook and create subsequent reports showing who has and has not completed the electronic acknowledgment. - The agency will still have each inmate sign for the Inmate Handbook and add a line item on the same receipt for the PREA Card that is also given to each inmate during the intake process. - The agency should explore the utilization of electronic signature pads to their JMS system. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) All newly arrested individuals are booked into Central Intake at the Main Jail. The Broward Sheriff's Office provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. This process is documented on (Broward County) Assessment Questionnaire Form. Twenty out of twenty Classification files reviews confirmed this practice. Classification makes the final assessments; housing decisions and Classification files confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (c) Based on the documentation provided and twenty inmate file reviews the facility utilizes an objective screening instrument that covers all aspects of this standard. Twenty out of twenty screenings are completed by both the contracted medical staff and the Classification staff. Classification makes the final assessments, housing decisions and Classification files confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (d) The intake screening instrument (Broward County) Sexual Abuse Screening Tool considers, 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;

(2) The age of the inmate;

(3) The physical build of the inmate;

(4) Whether the inmate has previously been incarcerated;

(5) Whether the inmate's criminal history is exclusively nonviolent;

(6) Whether the inmate has prior convictions for sex offenses against an adult or child;

(7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(8) Whether the inmate has previously experienced sexual victimization;

(9) The inmate's own perception of vulnerability; and

(10) Whether the inmate is detained solely for civil immigration purposes.

Therefore, the facility demonstrated compliance with this part of the standard during

	this audit. 115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Broward Sheriff's Office Assessment Questionnaire Form. The review of the form confirms compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates within 30 days from the inmate's arrival, the Broward Sheriff's Office will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Broward Sheriff's Office since the intake screening. The Classification Staff completes a follow-up interview with each inmate within 30 days to determine if additional information is available. This process is documented on the Broward Sheriff's Office Assessment Questionnaire Form. Therefore, the facility demonstrated compliance with this part of the standard during this audit. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and the 30-day PREA comprehensive training was documented on the appropriate JMS contact card. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21- PREA/Protective Custody Risk Assessment Policy mandates Broward Sheriff's Office will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. A review of rescreening showed there was a clear handoff from the PREA Manager and the Screening staff when circumstances warranted a reassessment. A reassessment was viewed by the auditor during the onsite visit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office does not discipline inmates for refusing to answer screening questions or not disclosing complete information. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (i) Broward Sheriff's Office implements appropriate controls on the

	dissemination 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. Based on policy review, interview with the Colonel and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Staff responsible for inmate movements have access to see who is listed as an aggressor and/or a victim; lists are maintained in the agency's Jail Management System. All sex offenders are housed in a segregated unit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42	**Use of screening information**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11), BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy, inmate and staff interviews, file review, and a review of the Broward County) Assessment Questionnaire Form; the following delineates the audit findings regarding this standard: 115.42 (a) Broward Sheriff's Office uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. This was confirmed during a review of policy and an interview with the North Broward Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstent with the agency's policy; therefore, requiring corrective action. **Corrective Action:** The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility. **Response to Corrective Action:**

A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label.

A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell.

In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others

The agency has also added new special condition flags for the following individuals:
Speech or cognitive disability
Self identifies as LGBTQ
Limited English Proficient (LEP)

These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes.

The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy requires Broward Sheriff’s Office makes individualized determinations about how to ensure the safety of each inmate. This was confirmed during a review of policy and an interview with the North Broward Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstant with the agency's policy; therefore, requiring corrective action.

Corrective Action:

The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update their JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-

wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility.

Response to Corrective Action:

A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label.

A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell.

In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others

The agency has also added new special condition flags for the following individuals:
Speech or cognitive disability
Self identifies as LGBTQ
Limited English Proficient (LEP)

These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes.

The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) Broward Sheriff’s Office outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on a case-by-case basis as required by this standard. Based on interviews with the self-identified LBGTI inmates housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate’s safety when making housing and programming assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) documents the North Broward Detention Facility procedures for placement and

	programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Based on interviews with the self-reported LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. Documentation provided revealed that a review was conducted and documented every six months as required. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (e) Broward Sheriff's Office requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. Based on interviews with self-identified LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety regarding housing assignments. Once a transgender inmate is processed into the facility, a multi-disciplinary team reviews the inmate's housing, programming, and worker status based on the inmate's own views, medical and mental health history, prior institutional behavior record, and programming needs. The multi-disciplinary team will then make an individualized assessment. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 14) requires that Broward Sheriff's Office transgender and intersex inmates be given the opportunity to shower separately from other inmates. The were no transgender inmates housed at the falicity during the onsite portion of the audit. The decision for housing and program placement for a transgender inmate is documented on the Broward Sheriff's Office in the JMS. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) stipulates that Broward Sheriff's Office does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43	**Protective Custody**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), twelve random staff interviews, one segregation staff member, thirty inmate interviews, PREA Manager Interview, and documentation review; the following delineates the audit findings regarding this standard: 115.43 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that inmates/detainees at high risk for sexual victimization are not placed 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. These policies outline the procedures to ensure compliance with this standard. PREA Coordinator, a Segregation Staff, and thirty inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) stipulates that inmates/detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If the Broward Sheriff's Office restricts access to programs, privileges, education, or work opportunities, the Broward Sheriff's Office documents the opportunities that have been limited, the duration of the limitation, and the reasons for such limitations. This was confirmed during an interview with the North Broward Detention Facility PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (c) Broward Sheriff's Office assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. The PREA Manager Segregation Staff, and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past 12 months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51	**Inmate reporting**
	Auditor Overall Determination: Exceeds Standard

Auditor Discussion

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 2-3), the Inmate Handbook, PREA Cards, and posters provided to inmates were utilized to verify compliance with this standard. The following delineates the audit findings regarding this standard:

115.51 (a) Broward Sheriff's Office provides multiple internal ways for inmates to report incidents of abuse or harassment: they include;

· Call Broward Sheriff's Office PREA hotline at (954) 831-3775
· Report to any staff, volunteer, contractor, or medical or mental health staff
· Submit a grievance, inmate request, or a sick call slip
· Report to the PREA Coordinator or PREA Compliance Manager
· Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on the inmate's behalf by calling (954) 831-3775
· Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273)
· Write a letter to Nancy J. Cotterman Center
400 N.E. 4th Street
Fort Lauderdale, FL 33301

Posters are located in each housing unit and all common areas in English, Creole, and Spanish outlining the multiple processes by which inmates can report sexual abuse and/or sexual harassment. The auditor successfully tested the phone system during the facility tour. Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and the PREA video; as well as interviews with random inmates and staff. During the onsite portion of the audit, the auditor did:

- How the facility provides the necessary PREA information to all inmates at each BCSO facility
- Confirm who is responsible for conducting the intake process
- Confirm interpreter services, including location and how to access the service
- Reviewed the PREA education deployment methods for inmates with disabilities
- Held informal conversations with staff and inmates concerning the PREA education process

There were no issues noted. The agency investigated eight PREA allegations in the past twelve months; the following is the how the allegations were reported:

- Note to Staff 1
- Grievance 2
- Kiosk 1
- Integral Hotline 3
-Verbal to Staff 1

The PREA hotline reporting phone number is affixed to each inmate telephone in the facility. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.51 (b) Broward Sheriff's Office provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Broward Sheriff's Office, and that can receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The Broward Sheriff's Office has by Memorandum of Understanding provided the address and phone number for Nancy J. Cotterman Center (NJCC) to the inmates satisfying the requirements of this standard. The auditor successfully tested the phone system during the facility tour. Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Card, Facility Orientation, PREA Posters, and the PREA video; as well as interviews with random inmates and staff.

During the onsite portion of the audit, the auditor did:
- Review how the facility provides the necessary PREA information to all inmates at each BCSO facility
- Confirm who is responsible for conducting the intake process
- Confirm interpreter services, including location and how to access the service
- Reviewed the PREA education deployment methods for inmates with disabilities
- Held informal conversations with staff and inmates concerning the PREA education process

There were no issues noted. During the onsite portion of the audit, the auditor also:
- observed whether signage throughout the facility can be easily read/accessed by persons in the facility
- observed if the signage was clear and easy to understand
- observed if the signage was in multiple languages
- observed the text size, formatting, and physical placement of the signage
- observed if the signage was obscured or unreadable due to damage or graffiti
-observed whether the information on the signage was accurate and consistent throughout the facility
- held informal conversations with staff and inmates concerning the signage

There were no significant issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. All staff, volunteers, and contractors have been trained in the mandatory reporting laws in the State of Florida; all confirmed this practice during interviews. This philosophy was confirmed during the review of the agency's PREA investigation files.

During the onsite portion of the audit, the auditor:
- Assessed the accessibility of writing instruments
- Observed how mail moves through the facility
- Accesses the security of written communications

	- Held informal conversations with staff responsible for sending and receiving inmate mail - Held informal conversations with staff concerning external reporting methods - Accessed how reports can be anonymous - Accessed inmate access to phones, kiosks, and tablets - Tested both internal and external reporting procedures. No significant issues were noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.51 (d) Broward Sheriff's Office staff may privately report sexual abuse and sexual harassment to the Broward County Sheriff's Office Internal Affairs Division or the PREA external telephone number. Informational posters are located throughout all facilities including common areas, administration areas, and inmate housing areas. This information includes the telephone number and address of the Nancy J. Cotterman Center (NJCC). Staff receive quarterly Roll Call training on reporting requirements through the Roll-Call Training SOP 11.01 PREA. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15 , staff interviews, inmate interviews, an interview with the agency-wide PREA Coordinator, and OAS documentation review; the following delineates the audit findings regarding this standard: 115.52 (a) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During the past twelve months, The North Broward Detention Facility has received two filed grievances concerning sexual abuse. An interview with the PREA Coordinator confirms this process. The agency investigated eight PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 2 - Kiosk 1 - Integral Hotline 3

-Verbal to Staff 1

- Written note to Staff 1

The agency complies with this section of the standard.

115.52 (b) The North Broward Detention Facility does not impose a time limit on when offenders/detainees may submit a grievance regarding an allegation of sexual abuse. The North Broward Detention Facility has received one grievance concerning sexual abuse in the past twelve months. An interview with the PREA Coordinator confirms this practice. Therefore, the agency complies with this section of the standard.

115.52 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states the agency will ensure that offenders/detainees alleging sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past twelve months, the North Broward Detention Facility has had two grievances filed concerning sexual abuse. This was confirmed by the PREA Coordinator in the Online Audit System provided by the PREA Resource Center. Additionally, the grievance was not referred to the staff member who is the subject of the complaint. The grievance/PREA investigation files were reviewed by the auditor. The investigations were detailed with outcomes of unfounded and unsubstantiated. Therefore, the agency is in compliance with this section of the standard.

115.52 (d) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require it, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for the reply, including any properly noticed extension, the offenders/detainee complainant may consider the absence of a response to be a denial at this level. During the past twelve months, the North Broward Detention Facility has had two grievances filed concerning sexual abuse. The grievance/PREA investigation files were reviewed by the auditor. The investigations were detailed with outcomes of unfounded and unsubstantiated. Interview with the PREA Coordinator reiterates this process; therefore, the agency is found to comply with this section of the standard.

115.52 (e) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states third parties including fellow offenders/detainees, staff members, family members, attorneys, and outside advocates, shall be permitted

	to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the offenders/detainees decline to have the request processed on his or her behalf, the agency shall document the offenders/detainees' decision. During the past twelve months, the North Broward Detention Facility has had two grievances concerning sexual abuse. The grievance/PREA investigation files were reviewed by the auditor. The investigations were detailed with an outcomes of unfounded and unsubstantiated. The PREA Coordinator confirmed this process. Therefore, the agency compiles with this section of the standard. 115.52 (f) The Broward County Sheriff's Office Policy 11.1 PREA page 14, states when an offender/detainee is subject to a substantial risk of imminent threat of sexual abuse, the offender/detainee may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent potential sexual abuse. Corrective and protective action must be pursued promptly. Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During the past twelve months, the North Broward Detention Facility has had two grievances filed concerning sexual abuse. The grievance/PREA investigation files were reviewed by the auditor. The investigation was detailed with outcomes of unfounded and unsubstantiated. Interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.

115.53	**Inmate access to outside confidential support services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practices, staff interviews, inmate interviews, MOU with the Nancy J. Cotterman Center (NJCC), review of eight PREA investigation files, and documentation review; the following delineates the audit findings regarding this standard: 115.53 (a) The agency has entered a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) which agrees to provide confidential outside victim advocacy services to the inmates at Broward Sheriff's Office. The mailing address and telephone number for this agency are made available to all inmates at the

	facility. Broward Sheriff's Office enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The auditor successfully tested the phone system. The person who answered the call, took the auditor through the process if an actual inmate had contacted them for assistance. The Sexual Assault representative stated they did utilize the bi-lingual employees if they received a call from a limited English Proficient inmate. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Inmates/Detainees are given this information upon intake on the Orientation Checklist. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 22-23) outlines this process. The PREA Coordinator stated the call is free and confidential. During the onsite portion of the audit, the auditor: - Assessed the accessibility of writing instruments - Observed how mail moves through the facility - Accesses the security of written communications - Held informal conversations with staff responsible for sending and receiving inmate mail - Held informal conversations with staff concerning external reporting methods - Accessed how reports can be anonymous - Accessed inmate access to phones, kiosks, and tablets - Tested both internal and external reporting procedures. No significant issues were noted. The agency investigated eight PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 2 - Kiosk 1 - Integral Hotline 3 -Verbal to Staff 1 - Written note to Staff 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (b) Broward Sheriff's Office informs inmates, before 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 by mandatory reporting laws. All calls to the Nancy J. Cotterman Center (NJCC) are not recorded. This was confirmed by the North Broward Detention Facility PREA Manager. During the onsite portion of the audit, the auditor also: - observed whether signage throughout the facility can be easily read/accessed by persons in the facility - observed if the signage was clear and easy to understand - observed if the signage was in multiple languages - observed the text size, formatting, and physical placement of the signage - observed if the signage was obscured or unreadable due to damage or graffiti -observed whether the information on the signage was accurate and consistent throughout the facility - held informal conversations with staff and inmates concerning the signage There were no significant issues noted. The agency investigated eight PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 2 - Kiosk 1 - Integral Hotline 3 - Verbal to Staff 1 - Written note to Staff 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (c) Broward Sheriff’s Office maintains a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.54	**Third-party reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on the review of Broward Sheriff's Office practices, eight PREA investigation file reviews, PREA Response Booklet: as well as a review of the agency website outlining third-party reporting; the following delineates the audit findings regarding this standard: 115.54 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 16) mandates that the North Broward Detention Facility provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the facility's website at: https://www.sheriff.org. Methods include mailing a letter to the Sheriff, mailing a letter to Broward County, mailing a letter to the South Florida Center against Sexual Abuse or calling the facility directly. The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. Each staff workstation has a PREA Response Booklet, outlining a quick reference to the required steps in responding to a sexual assault allegation. A review of PREA investigation files revealed that eight investigations were started and completed based on third party reports. The agency investigated eight PREA allegations in the past twelve months; the following is the how the allegations were reported: - Grievance 2 - Kiosk 1 - Integral Hotline 3 - Written note to Staff 1 - Verbal to Staff 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit. Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), Sexual Abuse Incident Check Sheet 14-2C, PREA Response Booklet, staff interviews, and documentation provided, the following delineates the audit findings regarding this standard:

115.61	**Staff and agency reporting duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Abuse Incident Check Sheet 14-2C, PREA Response Booklet, staff interviews, and

documentation provided, the following delineates the audit findings regarding this standard:

115.61 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), requires all North Broward Detention Facility 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 Broward Sheriff's Office; retaliation against inmates 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 agency utilizes a PREA checklist during every sexual abuse investigation. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. The audit did review all eight PREA investigation files; all were detailed and well organized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15) stipulates that Broward Sheriff's Office requires apart from reporting to designated supervisors or officials, staff 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. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. This was reiterated during an interview with the PREA Manager. The audit did review all eight PREA investigation files; all were detailed and well organized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (c) Broward Sheriff's Office requires contracted WellPath medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. WellPath Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentially, at the initiation of services. This was confirmed during interviews with two agency-wide WellPath Medical staff; each confirmed their knowledge of mandatory reporting laws in the State of Florida. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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, the Broward Sheriff's Office reports the allegation to the designated state or local services agency. This was

	confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (e) Broward Sheriff's Office reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to PREA Investigators as required. File review of eight PREA investigations confirmed this practice Abuse Incident Check Sheet 14-2C, PREA Response Booklet, staff interviews, and documentation provided, the following delineates the audit findings regarding this standard:

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), twelve random staff interviews, eight PREA Investigation file reviews, and documentation provided; the following delineates the audit findings regarding this standard. 115.62 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the Broward Sheriff's Office is subject to a substantial risk of imminent sexual abuse. This was confirmed during twelve random staff interviews. All newly admitted inmates are processed in Central Intake at the Mail Jail. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. The review of nine PREA investigation files clearly illustrated that everyone from line staff, intermediate supervisors, and the PREA Incident Review Team plays specific roles in dealing with PREA allegations. The North Broward Detention Facility maintains an updated "PREA Alert" list at all times; this list is made available to all staff charged with the duty of housing movements in the jail management system. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), three PREA Investigator interviews, the North Broward Detention Facility PREA Manager interview, and documentation provided; the following delineates the audit findings regarding this standard: 115.63 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Broward Sheriff's Office that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. This process is documented on memorandum. This process was corroborated during interviews with the PREA Manager and the three PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. A documentation review revealed that zero such notifications have occurred during the past twelve months. This was confirmed by the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Broward Sheriff's Office; the allegation is referred immediately to PREA Investigators to be investigated. This was confirmed during interviews with the PREA Manager and three PREA Investigators. The PREA Investigators stated they have not received any notification from another agency in the past twelve months. The agency has completed eight PREA investigations in the past twelve months, they were initially report by: Written note to Staff 1 Grievance 2 Verbal to Staff 1 Internal Hotline 3 Kiosk 1 Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64	**Staff first responder duties**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 17-19), PREA Response Booklet, staff interviews, contract medical and mental health staff interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.64 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.64 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of two contract employees. All twelve random staff interviews confirmed staff is trained in their role and responsibility as first responders. A first responder was also interviewed; it was clear the first responder understood the process as it is outlined in Broward County 11.1 policy. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. All eight PREA investigation files were reviewed by the lead auditor; the files were found to be detailed with witness statements, facility logs, and photos, and each drew a logical conclusion to determine the findings. The agency maintains a PREA Response Booklet at each staff workstation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.65	**Coordinated response**

	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, PREA Response Booklet, and documentation provided, the following delineates the audit findings regarding this standard: 115.65 (a) Broward Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 19) has a very comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with Incident Review Team members confirmed their knowledge of the response plan. A PREA Response Booklet is located at every employee workstation in the facility. The Booklet outlines the major components of the agency's PREA policy and procedures, including a detail sexual assault response checklist. Therefore, the facility exceeds compliance with this part of the standard during this audit

115.66	**Preservation of ability to protect inmates from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), interviews with the PREA Coordinator, collective bargaining agreement, and documentation provided; the following delineates the audit findings regarding this standard: 115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Broward Sheriff's Office policies on sexual abuse and sexual harassment. The Broward Sheriff's Office has not entered into any collective bargaining agreements during this audit cycle. This was confirmed during an interview with the PREA Coordinator. The Federation of Public Employees – A Division of the National Federation of Public and Private Employees (AFL-CE0) agreement has specific language outlining the disciplinary sanctions for members involved with PREA incidents. Nothing in the agreement restricts the restricts the agency in the following areas: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76

	(2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 21-22), staff interviews, inmate interviews, PREA Retaliation Monitoring Report, and documentation provided; the following delineates the audit findings regarding this standard: 115.67 (a) The Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) policy to protect all inmates and staff at Broward Sheriff's Office who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and designates which staff members or departments are charged with monitoring retaliation. Monitoring is documented on the PREA Retaliation Monitoring Report. The North Broward Detention Facility PREA Manager is also the Retaliation Monitor for the facility. There was one required retaliation monitoring conducted during the past twelve months; the monitoring documentation was reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (b) Broward Sheriff's Office has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Monitoring is documented on the PREA Retaliation Monitoring Report. The North Broward Detention Facility PREA Manager is also the Retaliation Monitor for the facility. There was one required retaliation monitoring conducted during the past twelve months; monitoring documentation was reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.67 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) calls for at least 90 days following a report of sexual abuse, Broward Sheriff's Office monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. Broward Sheriff's Office's monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. Monitoring is documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with the North Broward Detention Facility PREA Monitor. There was one required retaliation monitoring conducted during the past twelve months, retaliation documentation was reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (d), (e), (f) If any other individual who cooperates with an investigation expresses a fear of retaliation, the Broward Sheriff's Office takes appropriate measures to protect that individual against retaliation. Broward County's obligation to monitor shall terminate if the inmate is released from custody. This was confirmed during an interview with the Retaliation Monitor for the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.68	**Post-allegation protective custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12), PREA Manager, segregation staff interviews, inmate interviews, PREA Retaliation Monitoring Report 14-2D, and documentation provided; the following delineates the audit findings regarding this standard: 115.68 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that Broward Sheriff's Office prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the PREA Manager at the North Broward Detention Facility, segregation staff and inmates revealed that involuntary segregation has not been used for this purpose in the past twelve months. The North Broward Detention Facility PREA Manager stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part

	of the standard during this audit.

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), Broward County Records Retention Schedule, investigative staff interviews, training certificates, eight investigative reports, Collective Bargaining Agreement, Florida State Statute 112.532 (Law Enforcement and Corrections Officer Bill of Rights, as well as interviews with the PREA Investigators, PREA Coordinator, and the PREA Compliance Managers, the following delineates the audit findings regarding this standard: 115.71 (a) Broward County Sheriff's Office PREA investigators conduct an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. Broward Sheriff's Office has a multiple-layered investigation approach for Staff-on-Inmate sexual abuse allegations as a result of Florida State Statute 112.532, which states "the contents of the complaint and investigation shall remain confidential until such time as the employing law enforcement agency makes a final determination whether or not to issue a notice of disciplinary action consisting of suspension with a loss of pay, demotion, or dismissal. Due to Florida Statute 112.532 (Law Enforcement and Corrections Officer Bill of Rights), investigators cannot compel staff to be interviewed for internal affairs investigation. If an allegation of sexual abuse by staff-on-inmate is made, the potential criminal component takes priority, the allegation will immediately be forwarded to the Sex Crimes Unit, then Internal Affairs, and then back to the agency PREA Investigator for final review. All nine investigative files were reviewed, and it appeared that the investigations were conducted promptly, documented thoroughly, and objectively for all allegations, including third-party, and anonymous reports. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (b) Based on training curriculums provided, investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case

for administrative action or prosecution referral. Training records are reviewed so that all Sex Crimes Detectives, all Internal Affairs Investigators, all PREA Managers, and all PREA Investigators have specialized training. The agency has thirteen PREA criminal investigators and PREA administrative investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Broward County Sheriff's Office PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. This was confirmed during three interviews with agency PREA investigators. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. The auditor reviewed all eight PREA investigation files; the files are maintained electronically. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) stipulates, when the quality of evidence appears to support a criminal prosecution, Broward Sheriff's Office refers the case to the Broward County Sheriff's Office Criminal Investigations Division for the criminal investigation. This was confirmed during all eight investigation file reviews and during three interviews with agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as an inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. This was confirmed during interviews with three agency-wide PREA investigators. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) Broward Sheriff's Office administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. This was confirmed during nine investigation file reviews and during three interviews with agency PREA investigators. The agency investigated

	eight total PREA allegations including three sexual harassment and five sexual abuse allegations. The auditor did review all eight PREA investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (g) Broward Sheriff's Office criminal investigations are documented by the Broward County Sheriff's Office Criminal Investigations Division in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. This was confirmed during investigation file reviews and during three interviews with agency PREA investigators. The auditor did review all eight PREA investigation files; the files were found to be detailed and well-organized. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (h) The North Broward Detention Facility refers all allegations to the Broward County Sheriff's Office Criminal Investigations Division for investigation and prosecution when warranted. This was confirmed during eight investigation file reviews and during three interviews with agency-wide PREA investigators. The facility demonstrated compliance with this section of the standard. 115.71 (i) The Broward Sheriff's Office retains all written reports for as long as the alleged abuser is incarcerated or employed by the Broward Sheriff's Office, plus five years. This is stipulated in the Broward County Records Retention Schedule. PREA investigations are stored electronically with limited administrative access to ensure confidentiality. This was confirmed during an interview with the agency-wide PREA Coordinator. The auditor did review the electronic database. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (j) The departure of the alleged abuser or victim from employment or control of the North Broward Detention Facility or agency does not provide a basis for terminating an investigation. This was confirmed during interviews with three agency-wide PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (k) The Broward County Sheriff's Office Criminal Investigators conduct criminal sexual abuse investigations pursuant to the requirements of this standard. This was confirmed during interviews with three agency-wide PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.71 (l) Broward Sheriff's Office refers all criminal cases to the Broward County Sheriff's Office Criminal Investigator and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the Broward County Sheriff's Office Criminal Investigator and the Broward County Sheriff's Office Command Staff. Information is shared electronically on a secure database with limited access. The auditor did review the electronic database. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20), eight PREA investigation file reviews, and three investigative staff interviews; the following delineates the audit findings regarding this standard: 115.72 Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) states the North Broward Detention Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. This was reiterated during an interview with three PREA investigators and evident during the eight PREA Investigation File reviews. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. The auditor did review all eight PREA investigation files and found the outcomes to be appropriate based on the evidence in each investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), Inmate/Detainee PREA Allegation Notification Memorandum provided, Close Out Letters, and staff interviews; the following delineates the audit findings regarding this standard:

115.73 (a) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification form letter. Three examples were reviewed by the auditor. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Broward County Sheriff's Office in order to inform the inmate as required by this standard. Broward Sheriff's Office outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Broward Sheriff's Office practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:
(1) The staff member is no longer posted within the inmate's unit;
(2) The staff member is no longer employed at the facility;
(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Broward Sheriff's Office; or
(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Broward Sheriff's Office
The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification memorandum. Three examples were reviewed by the auditor. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Two inmates were released prior to notification. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22), following an inmate's allegation they had been sexually abused by another inmate, Broward Sheriff's Office subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted related to sexual abuse

	within the facility; or Broward Sheriff's Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Allegation Notification form. Three examples were reviewed by the auditor. The agency investigated eight total PREA allegations including three sexual harassment and five sexual abuse allegations. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (e) All such notifications or attempted notifications are documented on the Broward Sheriff's Office Inmate/Detainee PREA Notification form. Three examples were reviewed by the auditor. Two inmates were released prior to the completion of the investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22) outlines the agency's obligation to report under this standard terminates if the inmate is released from Broward Sheriff's Office's custody. This was confirmed during interviews with three agency-wide PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76	**Disciplinary sanctions for staff**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), documentation provided, and PREA Coordinator interview; the following delineates the audit findings regarding this standard. 115.76 (a) and (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) stipulates that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. The PREA Coordinator stated the North Broward Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were two allegations made against staff in the last twelve months; one was determined to be unfounded and the second was unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that 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 PREA Coordinator stated the North Broward Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were two allegations made against staff in the last twelve months; one was determined to be unfounded, and the other was unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) mandates that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement unless the activity was clearly not criminal, and to any relevant licensing bodies. The PREA Coordinator stated the North Broward Detention Facility has not had a staff member be disciplined, terminated, or charged related to a staff-on-inmate sexual abuse allegation in the past twelve months. There were two allegations made against staff in the last twelve months; one was determined to be unfounded, and the other was unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), review of PREA investigation files, the OAS documentation provided, Captain, and PREA Coordinator interviews; the following delineates the audit findings regarding this standard. 115.77 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and is reported to law enforcement unless the activity was clearly not criminal, and to relevant licensing bodies. During the past twelve months, there was one PREA incident at the North Broward Detention Facility involving a

	contract employee and none involving a volunteer. This was confirmed during interviews with the Captain and the agency-wide PREA Coordinator. The investigation file was reviewed by the auditor, and the outcome was unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.77 (b) Broward Sheriff's Office takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During the past twelve months, there had been one PREA incident at the North Broward Detention Facility involving a contract employee and none involving a volunteer. This was confirmed during interviews with the Facility Captain and the agency-wide PREA Coordinator. The investigation file was reviewed by the auditor, and the outcome was unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of the Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (pages 24-25), OAS documentation provided, agency head, and PREA Coordinator interviews; the following delineates the audit findings regarding this standard: 115.78 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), policy states that inmates/detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse (detainee on detainee) or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's or detainee's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. During the past twelve months, there were two inmate-on-inmate sexual abuse allegations investigated at the North Broward Detention Facility; both allegations were investigated and determined to be unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.78 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that the disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. During the past twelve months, there were two inmate-on-inmate sexual abuse allegations investigated at the North Broward Detention Facility, both were investigated and determined to be unsubstantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (d) The Mental Health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Broward Sheriff's Office does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. During the past twelve months, there were two unsubstantiated inmate-on-inmate sexual abuse allegations investigated at the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (e) Broward Sheriff's Office disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. This was confirmed during an interview with the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (f) The BCSO Policy 11.1 Prison Rape Elimination Act (page 25), states 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. During the past twelve months, there were two unsubstantiated inmate-on-inmate sexual abuse allegations investigated at the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (g) Broward Sheriff's Office prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on medical and mental health staff interviews, HCD-100_F-06 WellPath Response to Sexual Abuse-Broward FL Policy, and documentation provided; the following delineates the audit findings regarding this standard: 115.81 (a) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (b) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) page 10, and HCD-100_F-06 WellPath Response to Sexual Abuse-Broward FL Policy (page 5) mandates if the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Broward Sheriff's Office ensures the mate is offered a follow-up meeting with contracted mental health staff within 14 days of the intake screening as required by this part of the standard. Screenings are completed by Medical and Classification. The Wellpath Medical Staff shall document the referral to the WellPath Mental Health Staff. A medical records review produced two such referrals. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (d) Broward Sheriff's Office requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. This was confirmed during two interviews with WellPath Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (e) Broward Sheriff's Office requires WellPath Medical and WellPath Mental Health Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility unless the inmate is under the age of 18. This was confirmed during an interview with the Health Services Administrator. During the past twelve months, there has not been a situation where consent from an inmate under the age of 18 has occurred for PREA purposes. This was confirmed during interviews with WellPath Staff. The agency does have a general consent form in place if needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, PREA Coordinator interview, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 23), Memorandum of Understanding with Nancy J. Cotterman Center (NJCC), and documentation provided; the following delineates the audit findings regarding this standard: 115.82 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 23), states that Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) to treat inmate victims of sexual abuse. The North Broward Detention Facility also has contracted WellPath medical and mental health staff at the facility ensuring inmates 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. This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (b) Broward Sheriff's Office has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. Victims will be assessed by Nancy J. Cotterman Center staff (NJCC). This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (c) The North Broward Detention Facility ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. This is done in cooperation with Nancy J. Cotterman Center (NJCC) and Central Florida Center against Sexual Abuse. None of the five sexual abuse allegations required a need for emergency contraception or sexually transmitted infections prophylaxis. This was confirmed during two interviews with WellPath staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (d) Broward County Policy 11.1 Prison Rape Elimination Act (page 23), states that Broward Sheriff's Office requires that all treatment services provided to the

	victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Broward County bares all cost. This was confirmed during two interviews with WellPath staff and by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, WellPath HCD-100_F-06 Response to Sexual Abuse- Broward FL, Memorandum of Understanding with Nancy J. Cotterman Center, PREA Manager Interview, and OAS documentation provided; the following delineates the audit findings regarding this standard: 115.83 (a) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office to offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. This was confirmed during an interview with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (b) Broward County Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff's Office that the evaluations 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. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (c) Broward Sheriff's Office requires that contracted medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator and the PREA Manager at the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.83 (d and e) Based on WellPath HCD-100_F-06 Response to Sexual Abuse Broward FL (page 8), the policy requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC), and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (f) Broward Sheriff's Office requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (g) Broward Sheriff's Office PREA Policy 11.1 Page 24 requires that medical and mental health staff provide treatment services to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Health Services Administrator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (h) The North Broward Detention facility is a jail and is exempt from this section of the standard.

115.86	**Sexual abuse incident reviews**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, Contracted Medical Staff Interview, the PREA Manager Interview, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, the Sexual Abuse or Assault Incident Review Form, Incident Tracking Log, and documentation provided; the following delineates the audit findings regarding this standard:

115.86 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that Broward Sheriff’s Office conducts a sexual abuse incident review after every sexual abuse investigation, including where the allegation has not been substantiated unless the allegation has been determined to be unfounded. This was confirmed during file review and during interviews with the Incident Review Team. The review is documented on the Bureau of Investigations and Projects Unit's PREA Review Meeting form. There were two investigations reviewed at the North Broward Detention Facility in the past twelve months. The committee meets once per month. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (b) Broward Sheriff’s Office ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the Investigations and Projects Unit's PREA Review Meeting form. There were two investigations reviewed at the North Broward Detention Facility in the past twelve months. The committee meets once per month. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consists of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit. There are typically 25-30 attendees at each incident review meeting. This was confirmed during interviews with contracted Medical Staff, PREA Coordinator, and the North Broward Detention Facility PREA Manager. The committee meets once per month. All attendees are listed on the Investigations and Projects Unit PREA Review Meeting form.

115.86 (d) The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in Broward Sheriff’s Office where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. There were two investigations reviewed at the North Broward Detention Facility in the past twelve months. The agency has deployed a detailed PREA after-action review form which addresses all elements of the standard. Therefore, this meets this portion of the standard.

	115.86 (e) Broward Sheriff’s Office shall implement the recommendations for improvement or shall document its reasons for not doing so. Each of the four 30-Day reviews marked recommendations as deemed appropriate by the Incident Review Team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87	**Data collection**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.87 (a), (b) and (c) Broward Sheriff’s Office 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 aggregates the incident-based sexual abuse data at least annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) mandates that the incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) stipulates the Broward Sheriff’s Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. This was confirmed during an interview with the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (e) Broward Sheriff’s Office does not contract its inmates to other facilities. This was confirmed during an interview with the PREA Coordinator. Therefore, the

	facility demonstrated compliance with this part of the standard during this audit. 115.87 (f) Upon request, Broward Sheriff's Office provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.88 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) specifies that Broward Sheriff's Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Broward Sheriff's Office as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (b) Such reports include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the Broward Sheriff's Office's progress in addressing sexual abuse. This was reiterated during interviews with the PREA Coordinator and the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (c) Broward Sheriff's Office's report is approved by the Sheriff and made readily available to the public through its website https://www.sheriff.org Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.88 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 25), states that Broward Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the North Broward Detention Facility PREA Manager, and the OAS documentation provided; the following delineates the audit findings regarding this standard: 115.89 (a) through (d) : Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy mandates Broward Sheriff's Office agency-wide PREA Coordinator to make all aggregated sexual abuse data, readily available to the public at least annually through the agency website https://www.sheriff.org. All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. The agency has an excellent software system for managing PREA-related statistics. This was confirmed during interviews with the agency-wide PREA Coordinator and the North Broward Detention Facility PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.401 (a) and (b)The North Broward Detention Facility did have two PREA audits in 2018 and 2021. Both previous reports combined all four Broward County facilities into one PREA report that was submitted to the PREA Resource Center. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (h) The audit team has full access to all locations/areas of the North Broward Detention Facility. Therefore, the facility demonstrated compliance with this

	part of the standard during this audit. 115.401 (i) The auditor did obtain all necessary copies of audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (m) The audit team did conduct inmate interviews in a private setting. Before each interview, inmates were informed of: - their right to not speak to the audit team - a brief summary of the purpose of the PREA audit - the fact that the audit team would not ask any personal questions - the audit team background (including the team's independent contractor status) - the confidentiality requirements of the audit team and their name would not be in the facility's report - their right to be from retaliation for speaking to the audit team - how to report any such retaliation from speaking to the audit team - the availability of mental health staff if the conversation brought back bad memories or flashbacks from the past. 115.401 (n) The auditor did not receive any letters from inmates, staff, or third parties concerning the facility's PREA audit. Audit notices were observed in every housing unit, as well as all common areas. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.403	**Audit contents and findings**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 The North Broward Detention Facility has had PREA audits in 2018 and in 2021; the last report is posted on the agency’s website https://www.sheriff.org. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	**Supervision and monitoring**	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	**Supervision and monitoring**	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	**Supervision and monitoring**	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	**Youthful inmates**	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (b)	**Youthful inmates**	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.14 (c)	**Youthful inmates**	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	yes
115.15 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate’s genital status?	yes
	If an inmate’s genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	**Limits to cross-gender viewing and searches**	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	**Hiring and promotion decisions**	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	**Upgrades to facilities and technologies**	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	**Policies to ensure referrals of allegations for investigations**	

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	**Employee training**	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	**Employee training**	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	**Volunteer and contractor training**	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	**Volunteer and contractor training**	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	**Inmate education**	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	**Inmate education**	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	**Inmate education**	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	**Specialized training: Investigations**	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
115.35 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	**Staff and agency reporting duties**	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	**Staff and agency reporting duties**	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators?	yes
115.62 (a)	**Agency protection duties**	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	**Reporting to other confinement facilities**	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	**Staff first responder duties**	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	**Preservation of ability to protect inmates from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	**Reporting to inmates**	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	**Reporting to inmates**	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	**Disciplinary sanctions for inmates**	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	**Disciplinary sanctions for inmates**	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	**Disciplinary sanctions for inmates**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	**Disciplinary sanctions for inmates**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	**Disciplinary sanctions for inmates**	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	**Disciplinary sanctions for inmates**	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	**Disciplinary sanctions for inmates**	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
115.81 (b)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

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

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	**Data collection**	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	**Data review for corrective action**	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	

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

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes

PREA Facility Audit Report: Final

Name of Facility: Joseph V. Conte Detention Facility
Facility Type: Prison / Jail
Date Interim Report Submitted: 05/29/2024
Date Final Report Submitted: 10/01/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Brian D. Bivens	**Date of Signature:** 10/01/2024

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	04/16/2024
End Date of On-Site Audit:	04/19/2024

FACILITY INFORMATION	
Facility name:	Joseph V. Conte Detention Facility
Facility physical address:	1351 Northwest 27th Avenue, Pompano Beach, Florida - 33069
Facility mailing address:	

Primary Contact

Name:	Captain Eddison Ricketts
Email Address:	eddison_ricketts@sheriff.org
Telephone Number:	954-831-7507

Warden/Jail Administrator/Sheriff/Director	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Facility PREA Compliance Manager	
Name:	Richard Aronofsky
Email Address:	richard_aronofsky@sheriff.org
Telephone Number:	O: (954) 702-9008

Facility Health Service Administrator On-site	
Name:	Elisa Marenco
Email Address:	emarenco@wellpath.us
Telephone Number:	954-826-6801

Facility Characteristics	
Designed facility capacity:	1328
Current population of facility:	1011
Average daily population for the past 12 months:	1035
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males

Age range of population:	16-91
Facility security levels/inmate custody levels:	Minimum/Medium
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	215
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	398
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	171

AGENCY INFORMATION	
Name of agency:	Broward County Sherriff's Office
Governing authority or parent agency (if applicable):	Broward County
Physical Address:	2601 West Broward Boulevard, Fort Lauderdale, Florida - 33312
Mailing Address:	2601 West Broward Boulevard, Fort Lauderdale,
Telephone number:	9542687843

Agency Chief Executive Officer Information:	
Name:	Sheriff Gregory Tony
Email Address:	gregory_tony@sheriff.org
Telephone Number:	954-831-8901

Agency-Wide PREA Coordinator Information			
Name:	Joseph Lungha	**Email Address:**	joseph_lungha@sheriff.org

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
4	• 115.15 - Limits to cross-gender viewing and searches • 115.17 - Hiring and promotion decisions • 115.51 - Inmate reporting • 115.65 - Coordinated response
Number of standards met:	
41	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION	
GENERAL AUDIT INFORMATION	
On-site Audit Dates	
1. Start date of the onsite portion of the audit:	2024-04-16
2. End date of the onsite portion of the audit:	2024-04-19
Outreach	
10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Nancy J. Cotterman Center
AUDITED FACILITY INFORMATION	
14. Designated facility capacity:	1328
15. Average daily population for the past 12 months:	1043
16. Number of inmate/resident/detainee housing units:	16
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	( ) Yes (●) No ( ) Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	1043
38. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	8
39. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
41. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
42. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	6
43. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2

44. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	1
46. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	9
47. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	General population females are housed at Paul Rein Detention Facility and female juveniles are housed out North Broward. Juvenile males are also housed at Paul Rein.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	215
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	171

51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	398
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The number of the volunteers and contract employees reflects the total number for the entire agency (four total detention facilities).

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	11
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☑ Age ☑ Race ☑ Ethnicity (e.g., Hispanic, Non-Hispanic) ☑ Length of time in the facility ☑ Housing assignment ☑ Gender ☐ Other ☐ None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The audit selected random inmates to interview based on inmate rosters.
56. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	◉ Yes ○ No

57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no barriers in conducting inmate interviews. The audit team was provided private workspaces for each interview. Before each interview, the audit team informed each inmate of the following: - the reason for the interview - the right for the inmate to refuse to be interviewed - the importance of confidentiality and the fact that their name would not be in the report - the independent role of the audit team and training they have received to complete PREA audits - the right to be free from retaliation and how to report it after the interview was completed - the right to speak to a mental health professional if the conversation brought back bad memories or flashbacks from their past. No personal questions were asked and no inmate request to speak to a mental health professional after the interview was concluded.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	29

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/ resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/ residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

60. Enter the total number of interviews conducted with inmates/residents/ detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	8
61. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	Inmates diagnosed with a cognitive impairment are housed at another Broward County Detention Facility.
62. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	2
63. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1

64. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	6
65. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
66. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According to the Facility Administration, there were no transgender inmates housed at the facility during the onsite portion of the audit.
67. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	1

68. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	9
69. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	According to the Facility Administration, there were no inmates who had segregated for being at risk of victimization housed at the facility during the onsite portion of the audit.

70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	here were no barriers in conducting inmate interviews. The audit team was provided private workspaces for each interview. Before each interview, the audit team informed each inmate of the following: - the reason for the interview - the right for the inmate to refuse to be interviewed - the importance of confidentiality and the fact that their name would not be in the report - the independent role of the audit team and training they have received to complete PREA audits - the right to be free from retaliation and how to report it after the interview was completed - the right to speak to a mental health professional if the conversation brought back bad memories or flashbacks from their past. No personal questions were asked and no inmate request to speak to a mental health professional after the interview was concluded.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	12
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☑ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None

73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	(●) Yes ( ) No
74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no barriers in conducting staff interviews. All interviews were conducted in a private setting. Each staff was informed of the reason for the audit, their right not to speak with the audit team, retaliation measures for reporting after the interview, and the importance of confidentiality of the conversation/interview.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	18
76. Were you able to interview the Agency Head?	( ) Yes (●) No
a. Explain why it was not possible to interview the Agency Head:	The Lieutenant Colonel was interviewed on the last day of the audit.
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
78. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No

79. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☑ Agency contract administrator ☑ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☐ Line staff who supervise youthful inmates (if applicable) ☐ Education and program staff who work with youthful inmates (if applicable) ☑ Medical staff ☑ Mental health staff ☑ Non-medical staff involved in cross-gender strip or visual searches ☑ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☑ Investigative staff responsible for conducting administrative investigations ☑ Investigative staff responsible for conducting criminal investigations ☑ Staff who perform screening for risk of victimization and abusiveness ☑ Staff who supervise inmates in segregated housing/residents in isolation ☑ Staff on the sexual abuse incident review team ☑ Designated staff member charged with monitoring retaliation ☑ First responders, both security and non-security staff ☐ Intake staff

	☑ Other
If "Other," provide additional specialized staff roles interviewed:	The Classification Supervisor was also interviewed.
81. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	8
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☑ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☑ Religious ☐ Other
82. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	7
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☑ Medical/dental ☑ Food service ☐ Maintenance/construction ☐ Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	The audit team interviewed three Trinity Staff members assigned to the Warehouse were all food and laundry services occur for each of the four Broward County Sheriff's Detention Facilities. A total of eight agency volunteer interviews were conducted, including several by telephone. The agency-wide Health Services Administrator, agency-wide Mental Health Coordinator, agency-wide contract monitor, and three agency-wide administrative/ criminal investigators were also interviewed during the course of the audit process.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?	(●) Yes ( ) No
Was the site review an active, inquiring process that included the following:	
85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	(●) Yes ( ) No

86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	(●) Yes ( ) No
87. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	(●) Yes ( ) No
88. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No
89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	The facility was found to be very clean and well maintained. There were thirteen informal inmate, and nine informal staff interviews were conducted. During the tour, the lead auditor determined that the facility had ample PREA signage posted in each housing unit. Signage is available in English, Spanish, and Creole. Shower curtains were found to be adequate for both safety and privacy. Audit notices were posted throughout the facility. "Opposite Gender Announcement" signage was properly placed outside each housing unit door. The facility has an ample amount of Classification, Medical, and Mental Health staff.

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	The lead auditor requested and reviewed the following files before arrival for the onsite portion of the audit: Seven PREA Investigation Files Twenty inmate files (Ten more was requested during the onsite portion of the audit to clarify discrepancies from inmate interviews) Random Central Booking video footage showing fifteen inmates receiving the agency's PREA Card during intake Fifteen staff human resource and training records Eight volunteer training records Ten contract employee records.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	5	0	0	5
Staff-on-inmate sexual abuse	0	0	0	0
Total	5	0	0	5

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	2	0	2	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	2	0	2	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	1	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	1	1	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	5

99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	5
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	2
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	◉ Yes ○ No ○ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	○ Yes ○ No ◉ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months. They were all investigated, and breakdown as follows: Inmate on Inmate Sexual Harassment Unfounded 1, Unsubstantiated 1, Substantiated 0 Inmate on Inmate Sexual Abuse Unfounded 1, Unsubstantiated 4, Substantiated 0 Staff/Volunteers/Contract Employees on Inmate Sexual Harassment 0 Allegations in the past twelve months Staff/Volunteers/Contract Employees on Inmate Sexual Abuse 0 Allegations in the past twelve months. All seven investigation files were reviewed by the lead auditor. All seven were found to be detailed with witness statements, photos when needed, notification information, medical records as needed, and a detailed description of the findings and subsequent outcomes. If the allegations are related to any form of sexual misconduct or sexual abuse, the agency's specialized sexual abuse criminal investigators take over the case. If the allegation is made against a staff member the agency's internal affair will also conduct an investigation after the criminal investigation has concluded. The Bureau of Investigations and Projects completes all administrative PREA investigations. The agency has its own specialized forensics team to gather and collect crime scene evidence.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

Non-certified Support Staff

116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	◉ Yes ○ No
a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:	11

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?	◉ The audited facility or its parent agency ○ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) ○ A third-party auditing entity (e.g., accreditation body, consulting firm) ○ Other

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the documentation provided: as well as, the auditor's observation, BCSO Organization Chart, and interviews with the Agency-wide PREA Coordinator, and Joseph V. Conte PREA Manager, it was determined the Joseph V. Conte Detention Facility delineates compliance with Standard 115.11. 115.11 (a) The Broward Sheriff's Office staff follows the agency's policy, Policy 11.1 Prison Rape Elimination Act (PREA) which mandates zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. The auditor observed PREA information posted in each housing unit and in many common areas. Inmates are given PREA information upon intake at the Main Jail. This information is also given to each inmate when they are transferred to any of the Broward County Sheriff's Office facilities. Records review clearly showed that all staff, contract staff, and volunteers are trained on the agency's zero-tolerance policy against sexual abuse and sexual

	assault Informal conversations throughout the onsite process with both random staff and random inmates reviewed that the agency's PREA policy and processes are significantly embedded into the culture of the Joseph V. Conte. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.11 (b) and (c) The agency employs an upper-level, agency-wide PREA Coordinator. Lieutenant Lungha was appointed as the agency-wide PREA Coordinator. Lt. Lungha oversees the PREA process at the Joseph V. Conte, the Main Jail, Joseph V. Conte, and the Joseph V. Conte Facility. The agency provided the auditors with the organizational chart showing the PREA Coordinator position as an upper-level, agency-wide position, Lieutenant Lungha reports directly to Major Kevin Corbett. Lieutenant. Lungha is very knowledgeable of the PREA standards and actively assists the facility with compliance. Lieutenant Lungha has the authority to develop, implement, and oversee PREA compliance. Lieutenant Lungha is actively updating the facility as new Frequently Ask Questions (FAQs) results are published on the PREA Resource Center website. The Broward Sheriff's Office Sheriff appointed Lieutenant Richard Aronofsky to the position of PREA Manager at the Joseph V. Conte Facility. During interviews with the PREA Coordinator and the PREA Compliance Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit. The Broward Sheriff's Office meets this standard due to the fact it employs an agency-wide PREA Coordinator and a PREA Compliance Manager for each of the four facilities. Therefore, this standard was found to comply with this audit.

115.12	**Contracting with other entities for the confinement of inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.12 Based on the documentation provided: as well as, auditor observations, and interviews with the random staff, PREA Coordinator, and the Joseph V. Conte PREA Manager, it was determined the Broward Sheriff's Office does not contract with other facilities to house inmates assigned to their custody. Broward County does not contract with other agencies for the confinement of those in their custody. Therefore, this standard was found to comply with this audit.

115.13	**Supervision and monitoring**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based on staff interviews, review of documentation provided, and review of the Broward Sheriff's Office staffing analysis (January 19, 2021), 4.1 Facility Cell Inspections, Observations Checks, and Security Rounds pages 6-8, and Policy 11.1 Prison Rape Elimination Act (PREA). The following delineates the audit findings regarding this standard:

115.13 (a) The facility has documented and made its best efforts to comply regularly with a staffing plan that provides for adequate levels of staffing as described and required by this standard. The established staffing plan uses the criteria found in standard 115.13 (a) to include the physical layout of the facility, the composition of the residents housed, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, and any other relevant factors identified. Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. There have not been any judicial findings of inadequacy in the past twelve months. During the onsite portion of the audit, the auditor did observe:

- the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift

- staff line of sight and assess whether there are blind spots

- areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored

- the level of supervision and frequency of cell checks in housing areas (minimum and medium security facility)

- indirect supervision practices, including camera placement

No concerns were noted during the tour. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on the shift roster and submitted to the Joseph V Conte Detention Facility PREA Manager outlining the reason(s) for the deviation. There has not been any deviation reported where the staffing plan had not been complied with in the past twelve months, as confirmed by written documentation and during an interview with the Joseph V. Conte PREA Manager. The auditor observed sufficient staffing during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.13 (c) The staffing plan is reviewed annually by the PREA Coordinator and forwarded to the Major for review. It is then forwarded to Sheriff Tony with any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The annual staffing plan is also reviewed by the Federation of Public Employees. The last Annual Staffing Plan assessment was completed in February 2023. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.13 (d) Based on Broward Sheriff's Office Shift Supervisor interviews, facility JMS logs, staff interviews, and policy 4.1 Facility Cell Inspections, Observations Checks, and Security Rounds pages 6-8, Intermediate-level or higher-level supervisors are required to conduct and document unannounced rounds on all shifts as required. A random documentation review for August 14-16, 2023, September 8-9, 2023, and April 2, 2024, showed within 72 hours; numerous unannounced rounds were conducted in the facility. Such rounds are logged in the Jail Management System (JMS) inmate management software system. This was confirmed during an interview with a Lieutenant at the Joseph V. Conte Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.14	**Youthful inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.14 Based on the auditor's observation, documentation provided, interviews with the Joseph V. Conte PREA Manager, and PREA Coordinator, and staff interviews, the Joseph V. Conte Facility is an all-adult facility and does not house youthful offenders. Male juveniles are housed at the Paul Rein Detention Facility and female juveniles are housed at the North Broward Facility. Therefore, this standard was found in compliance during this audit.

115.15	**Limits to cross-gender viewing and searches**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), training

	curriculums, staff interviews, SOP 5.9, SOP 11-1, training file reviews, form BSO DJ 82, Statement of Search Preference, and documentation provided; the following delineates the audit findings regarding this standard: 115.15 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed that cross-gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. There have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. All random staff interviewed stated there are multiple males and females on duty every shift. This was reiterated during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) and prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. This practice was confirmed during female staff interviews. The Joseph V. Conte Detention Facility is an all-male inmate facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) prohibits frisk/pat searches of female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented. If a search is completed under exigent circumstances, the search is documented in the Jail Management System. There were no reported searches completed under exigent circumstances in the past twelve months. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. This practice was confirmed during female staff interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without a non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets, and changing their clothes. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 13 and 14) also require staff of the opposite gender to announce their presence prior to entering the housing

	units. Inmate and staff interviews revealed that opposite-gender announcements were common practice at this facility and reminders of this requirement are posted on the entry doors of all housing units exceeding the requirements of this part of the standard during this audit. Opposite Gender announcement signs are present at each entrance of the housing units. During the onsite portion of the audit, the auditor did observe: - all areas where confined persons may be in a state of undress, such as showering, using the toilet, and/or changing their clothes - if any nonmedical staff of the opposite gender are able to view confined persons in a state of undress, including from different angles and via mirror placement - electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of confined persons There were no issues noted. Therefore, the facility exceeds compliance with this part of the standard during this audit. 115.15 (e) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13), the training curriculum provided and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a WellPath medical practitioner. This was corroborated during interviews with LBGTI inmates and random staff. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.15 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 6), training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This is outlined in the BCSO lesson plan and in S.O.P. 11-1. Transgender inmates are asked about their gender preference for pat-downs; this is documented on form BSO DJ 82, Statement of Search Preference. During interviews with the LBGTI inmates, it was confirmed that the inmates felt the staff conducted proper searches. There were also no complaints filed by the LBGTI inmates in the past twelve months related to searches. There were no transgender inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practice, review of the lesson plans, and review of WellPath Language Line agreement, ERO Sign Language interpretation Services, invoices, approved attorney interpreter assistance, Inmate Handbook (Multiple Languages),as well as staff and inmate interviews and facility tour; the following delineates the audit findings regarding this standard: 115.16 (a) The Broward Sheriff's Office takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA posters, PREA education videos, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through the WellPath's Language Line Services. The facility also makes available TDD phones at each facility. The Joseph V. Conte has a sufficient number of bi-lingual employees to assist with interpreter needs. During interviews with the inmates identified to meet the aspects of this standard, they all confirmed having received training and materials they could understand. The agency has multiple employees who are fluent in Spanish and Creole. The inmates and staff also confirmed that the Language Line is available when needed. The auditor was provided with invoices and payments for Language Line Services. There was one blind/low vision, one deaf/hearing impaired inmate, six limited-English proficient, and eight inmates with physical impairments interviewed during the onsite visit. All inmates displayed a solid working knowledge of the agency's zero tolerance for sexual abuse and sexual harassment, and both were able to list the internal and external reporting mechanisms that the facility provides. During the onsite portion of the audit, the auditor: - tested the facility's process for securing interpretation services on demand - determined if persons confined in the facility must self-identify to access interpretation services - assessed the availability of interpretation services - observed the location of interpretation services No issues were noted. Therefore, the facility demonstrated compliance with this part

	of the standard during this audit. 115.16 (b) The Broward Sheriff's Office takes 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, including steps to provide interpreters who can interpret effectively accurately and impartially. WellPath Language Line interpreter services and/or staff interpreters are used to translate at this facility. PREA handouts, PREA postings, PREA education videos, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has an agreement through WellPath with the Language Line Services. There were six Spanish-speaking inmates interviewed (with the assistance of a staff interpreter) during the on-site visit and they confirmed during interviews receiving all written PREA information and viewing the Spanish version of the PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. The facility also makes TDD phones in each facility. The Joseph V. Conte Facility has a large number of bi-lingual employees to assist with interpreter services. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9)) outlines these practices. All sixteen targeted inmates that were interviewed displayed a solid working knowledge of the agency's zero tolerance for sexual abuse and sexual harassment, and both were able to list the internal and external reporting mechanisms that the facility provides. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.16 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-9) illustrates the facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. PREA handouts, PREA posters, PREA education video, and the inmate handbook are provided in English, Creole, and Spanish. The agency also has a Memorandum of Understanding through the WellPath Language Line Services. This was confirmed during interviews with first responders, the Joseph V. Conte PREA Manager, and the PREA Investigators. During the onsite tour of the facility, the auditor observed (English, Spanish, and Creole) PREA information posted in numerous locations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 4 and 5), Human Resource staff interviews, PREA Coordinator, BCSO DJ#194 PREA Questionnaire and personnel file reviews; Sheriff's Policy Manual 2.1 Employee Standards of Conduct, the following delineates the audit findings regarding this standard:

115.17 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 4-5) outlines that Broward Sheriff's Office does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer 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, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The facility completes thorough background checks on all applicants; as well as a background check is completed on all new applicants confirming compliance. The agency has fourteen trained background investigators. Background investigations include at a minimum:

Multiple Florida Law Enforcement Jurisdiction Checks

Florida Department of Law Enforcement

BSO Records

BSO Warrants

Interpol

Military History

Prior Employers

Reference Checks

This practice was confirmed during interviews with the agency's Human Resource Director and the Background Investigator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Broward Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer, who may have contact with inmates. This was confirmed during the review of ten human resource files for contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.17 (c)-1 The Broward Sheriff's Office requires a criminal background record check to be completed before hiring any new employee. Thirty out of thirty Human Resource files confirmed this practice. The agency has fourteen trained background investigators. Background investigations include at a minimujm: Multiple Florida Law Enforcement Jurisdiction Checks Florida Department of Law Enforcement BSO Records BSO Warrants Interpol Military History Prior Employers Reference Checks Therefore, the facility demonstrated compliance with this part of the standard during this audit. (c)-2 Broward Sheriff's Office makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. The agency has fourteen Background Investigators. A review of Human Resource files illustrated this practice. Two applicants had previously worked at a prior institution; both times, the Background Investigator had sent and received the prior documentation from the previous employer. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (d) Broward Sheriff's Office requires a criminal background record check to be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Ten out of ten agency-wide WellPath and Trinity files reviewed confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.17 (e) Broward Sheriff's Office completes background checks every 5 years. There is an extensive tracking system in place to monitor the process. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) outlines the requirements. The facility also participates in the NCIC RapBack Program. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.17 (f) Broward Sheriff’s Office instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. Each subsequent year of employment, employees are required to sign the agency’s Policy Manual. Page three of the Sheriff’s Policy Manual informs staff they are under BCSO colors while not on duty; specifically, when working for another employer. Staff must sign the BCSO DJ#194 PREA Questionnaire. File review showed that twenty out of twenty staff files contained a signed acknowledgment of this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. The PREA Coordinator stated there have not been any terminations of a contract employee for this circumstance in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 5) requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The PREA Coordinator stated the agency has not received such a request in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon the auditor’s observation during the tour, a review of the Joseph V. Conte physical plant, Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, PREA Manager interview, and a review of documentation provided; the following delineates the audit findings regarding this standard: 115.18 (a) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall

	consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. During this audit cycle, there were no substantial enhancements to the video technology at this facility. The was confirmed during interviews with random staff and the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.18 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. During this audit cycle, there were no substantial enhancements to the video technology at the Joseph V. Conte Detention Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21	**Evidence protocol and forensic medical examinations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), investigative staff interviews, WellPath 05.10.01 Sexual Misconduct-Battery Intervention and Response Procedures, review of seven PREA investigation files, interviews with the PREA Coordinator, PREA Manager, and two contracted medical staff members, and a review of documentation provided; this delineates the audit findings regarding this standard: 115.21 (a) and (b) Broward Sheriff's Office complies with all elements of this standard. Documented in Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20); the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. Broward Sheriff's Office conducts its own PREA criminal investigations. The Joseph V. Conte Detention Facility investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the Broward County Detectives and the Broward County Sheriff's Bureau of Investigations and Projects investigators on each case. This was confirmed during an interview with the PREA Coordinator. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfound, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of

	the standard during this audit. 115.21 (c) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. During the past twelve months, there were no inmates who alleged sexual abuse that constituted the need for a SANE exam. An interview with the Director of the Nancy J. Cotterman Center (NJCC) confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (d) The Broward Sheriff's Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020) which agrees to provide outside victim advocacy services to the inmates. The services of these victim advocates have not been requested or used by the inmates during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (e) Broward Sheriff's Office has entered into a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) (effective June 2020); which agrees to provide outside victim advocacy services to the inmates upon request. Interviews with multiple Joseph V. Conte staff members confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.21 (f) The Broward Sheriff's Office is responsible for administrative investigations and criminal investigators with the Broward County Sheriff's Office shall conduct all criminal investigations covering all aspects of this standard. Broward Sheriff's Office conducts its own PREA criminal investigations. This was confirmed during an interview with the PREA Coordinator and the review of all PREA investigation files from the past twelve months. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was

	deemed to be unsubstantiated. Therefore, this part of the standard does not apply to this facility. 115.21 (g) The Joseph V. Conte Facility is exempt from this section because the agency conducts its own PREA criminal investigations. 115.21 (h) Broward Sheriff's Office offers all victims of sexual abuse access to forensic medical examinations by Nancy J. Cotterman Center (NJCC) staff (signed in June 2020) without financial cost to the inmate, where evidentiary or medically appropriate. Nancy J. Cotterman Center (NJCC) also supplies victim advocates upon request for the victims of sexual abuse. This was confirmed during interviews with the PREA Coordinator and two contracted medical health staff members. Therefore, this part of the standard does not apply to this facility.

115.22	**Policies to ensure referrals of allegations for investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 19-20) investigative staff interviews, and a review of documentation provided; the following delineates the audit findings regarding this standard: 115.22 (a) The Broward Sheriff's Office is required to investigate all PREA complaints received at this facility. Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). All potential criminal activity is referred to the Broward County Sheriff's Office PREA Investigator assigned to the Joseph V. Conte Facility. There were five cases of sexual abuse referred and investigated during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (b) All PREA allegations are investigated by the Broward Sheriff's Office for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Broward County Sheriff's Office PREA Investigator for criminal investigation and prosecution as warranted. This was confirmed during an interview with the agency-wide PREA Coordinator. This policy is published (English, Creole, and Spanish) on the agency's website https://www.sheriff.org/DOD/

	Documents/Prison%20Rape%20Elimination%20Act.pdf as required. Reporting methods include: Call Broward Sheriff's Office PREA Hotline (954) 831-3775 Report to any staff, volunteer, contractor, or medical/mental health staff Call the Nancy J. Cotterman Center (954) 761-7273 Write a Letter to the Nancy J. Cotterman Center 400 N.E. 4th Street Fort Lauderdale, FL 33301 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.22 (c) The Broward Sheriff's Office refers all criminal allegations for the investigation to the designated Broward County Sheriff's Office PREA investigators. This was confirmed during an interview with the agency-wide PREA Coordinator. The requirements of this part of the standard are outlined in the policy that is posted on the website https://www.sheriff.org/DOD/Documents/Prison%20Rape%20Elimination%20Act.pdf . The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfound and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31	**Employee training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) staff interviews, fifteen Joseph V. Conte's random staff training file review, and review of documentation provided by the BCSO 19-page PREA Lesson Plan, sign-in sheets, signed acknowledgment forms, training curriculums, and employee handouts); twelve random staff interviews, the following delineates the audit findings regarding this standard:

	115.31 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) requires Broward Sheriff's Office to train all their employees who have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' right to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (b) The training is tailored to both the male and female gender of the inmates at Broward Sheriff's Office. This is done because staff may be reassigned to a different BCSO facility. This was confirmed after reviewing the BCSO 19-page PREA Training Lesson Plan and an interview with the training staff. All random staff interviewed confirmed they had received initial PREA training and all those who had worked at the facility for more than one year stated they had received PREA training in annual in-service. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. The training staff provides training to each of the four Broward County Sheriff's Office facilities. All Joseph V. Conte staff receive annual refresher PREA training during in-service according to policy 11.1 which meets the requirements of this standard. A review of fifteen employee training files illustrated that all twenty

	were found to comply with the policy. All twelve random staff interviewed confirmed they had received initial PREA training and all those who had worked at the facility for more than one year stated they had received PREA training in annual in-service. Therefore, the facility meets this part of the standard during this audit. 115.31 (d) Broward Sheriff's Office documents, through employee examination on Broward County PREA Policy, demonstrating all employees understand the training they have received. All fifteen training file reviews confirmed this practice. All twelve random staff interviewed confirmed they had received initial PREA training and all those who had worked at the facility for more than one year stated they had received PREA training in annual in-service. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32	**Volunteer and contractor training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 7) volunteer and contractor interviews, random training file review, and review of documentation provided, Civilian Security PREA Orientation (40 pages), sign-in sheets, signed acknowledgment forms, training curriculums, and handouts; the following delineates the audit findings regarding this standard: 115.32 (a) Broward Sheriff's Office ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Broward Sheriff's Office's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The BCSO Civilian Security PREA Orientation (40 pages) outlines the training given to all volunteers and contractors. Interviews with four contractors confirmed they had been properly trained. Signature on the Broward County PREA Policy Acknowledgment and/or Broward County Sheriff's Office Training Roster acknowledges each volunteer and contractor has received and understands the PREA training provided. Eighteen agency-wide contractors and volunteers records confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (b) The level and type of training provided to volunteers and contractors are based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Broward County's zero-tolerance policy regarding sexual abuse and sexual

	harassment and their requirements to report such incidents. A review of training eighteen records also confirmed the training. Interviews with four contractors and eight confirmed they had been properly trained. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.32 (c) Broward Sheriff's Office documents through signature on the Broward County Sheriff's Office Training Roster, that volunteers and contractors understand the training they have received. Interviews with four agency-wide contractors and eight agency-wide volunteers confirmed they had been properly trained. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33	**Inmate education**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 7-8) the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and the PREA video; as well as interviews with the Joseph V. Conte PREA Manager, Classification Staff interview, verification of PREA video working, random inmates, and staff interviews: the following delineates the audit findings regarding this standard: 115.33 (a) During the intake process, inmates receive information explaining Broward Sheriff's Office's zero-tolerance policy (Broward County Policy 11.1 Prison Rape Elimination Act (PREA)) regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates sign the Orientation Checklist that they have received the Preventing Sexual Abuse Brochure which is available in English, Creole, and Spanish. All inmates are booked at the Main Jail and complete the orientation process before being placed in another BCSO Facility. All PREA Managers are made aware of new inmates arriving at their respective facilities. The PREA Manager ensures all new arrivals at their respective facility are reassessed. This was confirmed during an interview with the Classification Staff. During the onsite portion of the audit, the auditor: - confirmed who is responsible for conducting the intake process. - tested how the facility provides the necessary PREA information to all confined persons, regardless of ability and language, including whether: - observed that written information was clear and provided at an appropriate reading

level and was accessible for all persons confined in the facility, including those who are limited English proficient (LEP)

- ensured the facility provided interpreters when needed, to assist deaf, hard of hearing, and non-English speaking persons confined in the facility

- ensured that Staff are prepared to read written information out loud, if applicable, to make accommodations for persons confined in the facility when necessary

- confirmed mental health staff or other skilled educators/staff were involved in providing the required information to confined persons with cognitive or functional disabilities as needed.

There were no issues noted. Twenty random inmate records reviewed all twenty inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Therefore, the Joseph V. Conte Detention Facility demonstrated compliance with this part of the standard during this audit.

115.33 (b) Within 30 days of intake, Broward Sheriff's Office provides comprehensive education to the inmates, administered by video, regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The additional education is provided in the form of a video (both English and Spanish). This practice is outlined in the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8). All inmates are booked at the Main Jail and complete the orientation process before being placed in another BCSO Facility. All PREA Managers are made aware of new inmates arriving at their respective facilities. The PREA Manager ensures all new arrivals at their respective facility are reassessed. There were a number of inmates who did not remember if they had watched the PREA orientation video utilized for the more in-depth training. Intake files did show all ten inmates had signed a form acknowledging they had watched the video. PREA information including screenings, reassessments, PREA information upon intake, and comprehensive PREA education is maintained in the agency's jail management system. The auditor conducted an additional interview with Classification Staff, tested the video system and additional inmates were interviewed, the video appeared to be working appropriately, all stated they did watch the video. During the onsite portion of the audit, the auditor tested and accessed:

- The facility's process for securing interpretation services on-demand.

- How the facility provides the necessary PREA information to all confined persons, regardless of ability and language.

- The ability of interpretation services.

- The accessibility of interpretation services.

There were no concerns noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Recommendations:

Add the PREA Information on the facility property sheet signed by each newly admitted inmate and explore the option of adding digital signature pads.

Add the PREA video to the kiosk/tablets and required inmate video acknowledgment and add reports indicating who has and has not acknowledged the viewing of the video.

115.33 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides such education within one year of the effective date of the PREA standards to all its inmates and provides education to inmates upon transfer as required by this standard. This was confirmed during an interview with the Joseph V. Conte PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with Language Line Services. PREA handouts, PREA postings, PREA education videos, and the inmate handbook are provided in English, Creole, and Spanish. The facility also makes available a TDD phone at each of the four facilities. There was one blind/low vision, one deaf/hard of hearing inmate, six limited-English proficient, and eight inmates with a physical impairment incarcerated at the time of the onsite visit. All targeted inmates were able to understand the auditor during the interview, and all displayed a working knowledge of the agency's zero-tolerance against sexual abuse and sexual harassment and were able to list the internal and external modes of reporting. Six limited English proficient inmates had documentation in their intake file showing they all had received a PREA Brochure, properly screened, and watched the PREA education video. All LEP inmates stated they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was documentation provided of inmates' participation in PREA educational sessions as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) Joseph V. Conte does provide the inmates with posters, pamphlets, and an

	inmate handbook in English, Creole, and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Inmates/detainees are given the “Broward County PREA – Prevention, Detections, and Response Brochure”. The agency has “Zero Tolerance” Posters located in all common areas of the facility. Records review showed that six out of six LEP inmates received education information in a Spanish format; all six LEP inmates stated they felt safe in the Joseph V. Conte Facility. During the onsite portion of the audit, the auditor observed: - whether signage throughout the facility can be easily read/accessed by persons in the facility - signage is provided in English and translated for the other languages (Spanish and Creole) most commonly spoken in the facility. - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. Fifteen random inmate records reviewed all fifteen inmates were PREA screened within 72 hours of booking at the Mail Jail by the Medical Staff and Classification, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. PREA information including screenings, reassessments, PREA information upon intake, and comprehensive PREA education is maintained in the agency's jail management system.Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34	**Specialized training: Investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff’s Office practices as well as, Policy 11.1 Prison Rape Elimination Act (PREA) page 7, Investigators' training file review, and three BCSO Agency investigative staff interviews, review of seven PREA investigation files; the following delineates the audit findings regarding this standard: 115.34 (a) In addition to the general training provided to all employees Broward Sheriff’s Office ensures that the PREA Administrative Investigators receive training in

	conducting investigations in confinement settings. The agency's PREA investigators are a specialized unit, not attached to a specific facility, and are responsible for conducting all PREA investigations at all four BCSO facilities. This was confirmed during a review of the Investigation's training records. The Broward County Sheriff's Office conducts all PREA criminal investigations. Investigators have specialized training for sexual assault in a confinement setting. The agency has fourteen PREA criminal investigators and PREA administrative investigators. All three investigators interviewed displayed a clear understanding of the training they had received. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency has thirteen PREA criminal investigators and eleven PREA administrative investigators. All three investigators interviewed displayed a clear understanding of the training they had received. A total of seven PREA allegations (five sexual abuse and two sex harassment) were investigated by BCSO investigators in the past twelve months. The auditor reviewed all seven PREA investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.34 (c) Broward Sheriff's Office maintains documentation that Broward County Sheriff's Office investigators have completed the required specialized training in conducting sexual abuse investigations. Broward County Sheriff's Office requires investigators to have specialized training for sexual assault in a confinement setting. The agency has thirteen PREA criminal investigators PREA administrative investigators. The auditor found the facility PREA Investigators to be very knowledgeable and well versed in the PREA standards as they pertain to investigations and evidentially standards. All three investigators interviewed displayed a clear understanding of the training they had received. A total of seven PREA allegations (five sexual abuse and two sex harassment) were investigated by BCSO investigators in the past twelve months. The auditor reviewed all seven PREA investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on a review of the Broward Sheriff's Office practices, as well as ten PREA

	Specialized Medical/Mental Health training records, WellPath training file review, WellPath HCD-100 Response to Sexual Abuse- Broward FL Policy, and medical and mental health staff and PREA Coordinator interviews; the following delineates the audit findings regarding this standard: 115.35 (a) WellPath provides PREA Specialized Medical/Mental Health training video, curriculum provided, training file Broward Sheriff's Office review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. This is mandated in WellPath HCD-100 Response to Sexual Abuse- Broward FL Policy. A review of ten training records and interviews with two agency-wide WellPath Medical Staff members confirmed this practice. Joseph V. Conte has specific contracted medical and mental health staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (b) The medical staff at this facility does not conduct forensic exams. This was confirmed during interviews with the WellPath Medical Staff and the PREA Coordinator. Broward Sheriff's Office has a Memorandum of Understanding with Nancy J. Cotterman Center (NJCC) for SANE/SAFE examinations. Therefore, this part of the standard does not apply to this facility. 115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. The training is an online course entitled; PREA Specialty Training for medical and mental health staff. A review of ten contracted medical and mental health training records and interviews with two agency-wide WellPath staff members assigned to the Joseph V. Conte Facility confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.35 (d) Medical and mental health care practitioners at Joseph V. Conte also receive the annual training mandated for all employees, contractors, and volunteers. A review of ten training records and interviews with two agency-wide WellPath staff members assigned to the Joseph V. Conte Facility confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41	**Screening for risk of victimization and abusiveness**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based the auditor's observations, the Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-11), inmate and staff interviews, Operations Order CL-21, inmate file reviews, facility video from Intake, and a review of the Broward Sheriff's Office Sexual Abuse Screening Tool 11.1B; the following delineates the audit findings regarding this standard:

115.41 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 8) mandates that Broward Sheriff's Office ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. All new inmates are booked at the Main Jail and receive orientation before being assigned to another BCSO facility. Random inmate interviews confirmed this practice. Inmates sign a facility property receipt, indicating they have received the facility's brochure on PREA during booking. The information is available in English, Spanish, and Creole. A number of inmates interviewed stated they did not remember receiving a PREA brochure upon intake. The auditor requested, received, and reviewed inmate video showing inmates walking around in the intake area with the PREA information in their possession. The review of their intake files showed where each had signed for the brochure as a facility-issued item. Fifteen random inmate records reviewed all fifteen inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Screenings, reassessments, initial PREA information upon intake, and PREA comprehensive education is maintained in the agency's jail management system. The brochure outlines basic information on the topics of sexual assault and sexual harassment, the agency's zero tolerance, reporting procedures, and the victim advocacy support available. During the onsite our, the auditor:

- confirmed who completes the risk screening

- assessed whether the screening process occurs in a setting that ensures as much privacy as possible

- assessed whether screening staff ask screening questions in a manner that fosters comfort and elicits responses

- tested the method of assessing confined persons for risk of being sexually abused by other inmates confined in the facility

No issues were noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.41 (b) The Broward Sheriff's Office provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. screening and orientation are completed at the Mail Jail; where all new inmates are booked in the Broward County Sheriff's Office system, ensuring consistency with agency policy and PREA compliance. This process is documented on (the Broward County) Assessment Questionnaire Form. Fifteen out of fifteen file reviews confirmed compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (c) Based on the documentation provided and inmate file reviews the agency utilizes an objective screening instrument that covers all aspects of this standard. Fifteen out of fifteen Classification files confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (d) The intake screening instrument (Broward County) Sexual Abuse Screening Tool considers, 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; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously experienced sexual victimization; (9) The inmate's own perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (e) The initial screening considers prior acts of sexual abuse, prior convictions

for violent offenses, and history of prior institutional violence or sexual abuse, as known to Broward Sheriff's Office Assessment Questionnaire Form. All initial screenings are completed at the Mail Jail and reassessments are completed at the appropriate housing facility. Fifteen random inmate records reviewed all fifteen inmates were PREA screened within 72 hours of booking at the Mail Jail, were reassessed withing 30 days from booking, signed for initial PREA information upon intake and signed for the 30-day PREA comprehensive training. Screening are completed by Medical Staff and Classification, Classification completes the final ruling on the inmate's PREA status. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates within 30 days from the inmate's arrival, the Broward Sheriff's Office will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Broward Sheriff's Office since the intake screening. The Classification Staff completes a follow-up interview with each inmate within 30 days to determine if additional information is available. All initial screenings are completed at the Mail Jail and reassessments are completed at the appropriate housing facility. This process is documented on the Broward Sheriff's Office Assessment Questionnaire Form. Fifteen out of fifteen Classification files confirmed this practice. Classification conducts a face-to-face reassessment with each inmate. The auditor did observe a reassessment during the onsite portion of the audits. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Auditor Recommendation:

Consider the reassessment approach for those who have already disclosed sexual abuse. Modifications made to the reassessment should be made in consultation with mental health staff.

115.41 (g) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. A review of rescreening showed there was a clear handoff from the Classification Staff and the Medical Staff when circumstances warranted a reassessment. Three such re-screenings were reviewed during the onsite visit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (h) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) mandates Broward Sheriff's Office does not discipline inmates for refusing to answer screening questions or not disclosing complete information. This was confirmed

	during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.41 (i) Broward Sheriff's Office implements appropriate controls on the dissemination 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. Based on policy review, interviews with the agency-wide PREA Coordinator and the PREA Manager at the Joseph V. Conte Facility, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work, and program assignments. Staff responsible for inmate movements have access to see who is listed as an aggressor and/or a victim; lists are maintained in the agency's Jail Management System. All sex offenders are housed in a segregated unit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42	**Use of screening information**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11), Classification OP Order, inmate and staff interviews, file review, and a review of the Broward County) Assessment Questionnaire Form; the following delineates the audit findings regarding this standard: 115.42 (a) Broward Sheriff's Office uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. This was confirmed during a review of policy and an interview with the Paul Rein Detention Facility PREA Manager. Records review in the agency's practice was found to be inconstent with the agency's policy; therefore, requiring corrective action. **Corrective Action:** The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have

	the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update its JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility. **Response to Corrective Action:** A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label. A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell. In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others The agency has also added new special condition flags for the following individuals: Speech or cognitive disability Self identifies as LGBTQ Limited English Proficient (LEP) These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes. The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) and the BCSO Operations Order CL -21 – PREA/Protective Custody Risk Assessment Policy requires Broward Sheriff’s Office makes individualized determinations about how to ensure the safety of each inmate. This was confirmed during a review of policy and an interview with the Paul Rein Detention Facility PREA Manager. Records review in the agency's JMS was found to be inconstant with the agency's policy; therefore, requiring corrective action. **Corrective Action:**

	The agency should provide administrative staff with access to JMS reports listing those that screened at risk of abusiveness and at risk of aggressiveness, allowing for an additional layer of supervision. The agency should update the housing policy to specifically address the housing of inmates that screened at risk of victimization with inmates who screen as potential aggressors. The agency shall train all staff that have the ability to make housing changes on the new policy revision. The agency should also implement periodic checks to ensure the policy is being complied with. If possible, the agency should update its JMS to provide staff with an alert when a housing move violates the new revised policy. The Facility Administration, Agency-wide PREA Coordinator and the Lead Auditor will monitor the Corrective Action Plan for 3-6 months to ensure the plan has been institutionalized in the facility. **Response to Corrective Action:** A new special condition flag has been created titled "Sexual Victimization Risk." The Classification Unit has implemented a review process to ensure all offenders that meet criteria based on an objective risk assessment or identified while in custody through new information are flagged with the label. A pop-up warning was created in the agency's jail management system that prohibits unauthorized housing moves where there is an attempt to house a sexual aggressor with a sexual victimization risk in the same cell. In addition, if by chance a mistake is made on the part of an authorized individual where a sexual aggressor and sexual victimization risk are housed in the same cell, an automatic email notification is generated and sent to PREA Coordinator, Classification supervisors, and others The agency has also added new special condition flags for the following individuals: Speech or cognitive disability Self identifies as LGBTQ Limited English Proficient (LEP) These new designations have been added to the agency's special condition report that was created, which will allow the PREA Coordinator, classification managers, and facility PCM’s to review housing assignments to minimize the potential of sexual aggressors being housed with vulnerable populations. This report is expected to be reviewed at least monthly and is being discussed for addition to monthly SAIR meeting for documentation purposes. The agency has completed a training session with all staff on the new procedures and processes. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (c) Broward Sheriff’s Office outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on a case-by-case

	basis as required by this standard. Based on interviews with the two self-identified LBGTI inmates housed at this facility the inmate confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. Initial screening and orientation are completed at the Mail Jail, where all new inmates are processed into the Broward County Sheriff's Office system. This was confirmed during a review of policy and during an interview with the PREA Manager. Joseph V. Conte Staff completes all necessary and/or required PREA reassessments. There were no transgender or intersex inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11) documents Broward Sheriff's Office procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Based on interviews with the two self-reported LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety when making housing and programming assignments. The inmates also confirmed the PREA Manager always inquired about the inmate's safety. Documentation provided revealed that a review was conducted and documented every six months as required. There were no transgender or intersex inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.42 (e) Broward Sheriff's Office requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. Based on interviews with two self-identified LBGTI inmates housed at this facility the inmates confirmed feeling safe at the facility and felt staff considered the inmate's safety regarding housing assignments. Once a transgender inmate is processed into the Mail Jail, a multi-disciplinary team reviews the inmate's housing, programming, and worker status based on the inmate's own views, medical and mental health history, prior institutional behavior record, and programming needs. The multi-disciplinary team will then make an individualized assessment. There were no transgender or intersex inmates housed at the facility during the onsite portion of the audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43	**Protective Custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), segregation staff interviews, PREA Manager interview, random and targeted inmate interviews, and documentation review; the following delineates the audit findings regarding this standard: 115.43 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that inmates/detainees at high risk for sexual victimization are not placed 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. These policies outline the procedures to ensure compliance with this standard. Segregation staff and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) stipulates that inmates/detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If the Broward Sheriff's Office restricts access to programs, privileges, education, or work opportunities, the Broward Sheriff's Office documents the opportunities that have been limited, the duration of the limitation, and the reasons for such limitations. This was confirmed during interviews with the PREA Manager and Joseph V. Conte segregation staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.43 (c) Broward Sheriff's Office assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. Joseph V. Conte Segregation Staff and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past twelve months at this facility. This was confirmed during interviews with the PREA Manager and Joseph V. Conte segregation staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51	**Inmate reporting**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

	Based on interviews with random and targeted inmates, random staff interviews, auditor observations, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 2-3), the Inmate Handbook, PREA Brochures, and posters provided to inmates were utilized to verify compliance with this standard; the following delineates the audit findings regarding this standard: 115.51 (a) Broward Sheriff's Office provides multiple internal ways for inmates to report incidents of abuse or harassment: they include; · Call Broward Sheriff's Office PREA hotline at (954) 831-3775 · Report to any staff, volunteer, contractor, or medical or mental health staff · Submit a grievance, inmate request, or a sick call slip · Report to the PREA Coordinator or PREA Manager · Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on the inmate's behalf by calling (954) 831-3775 · Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273) · Write a letter to Nancy J. Cotterman Center 400 N.E. 4th Street, Fort Lauderdale, FL 33301 Posters are located in each housing unit and in all common areas in English, Creole, and Spanish outlining the multiple processes by which inmates can report sexual abuse and/or sexual harassment. The auditor successfully tested the phone system during the facility tour. The auditor did observe that the information was available in English, Spanish, and Creole. During the onsite portion of the audit, the auditor did observe: - whether signage throughout the facility can be easily read/accessed by persons in the facility - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided The auditor also: - completed and submitted a test report - tested the accessibility of reporting procedures - had informal conversations with staff and inmates regarding reporting methods

	- reviewed the inmate mail process - reviewed the inmate grievance process - tested the inmate phones - tested the PREA hotline No issues were noted. The PREA hotline phone number is affixed to each inmate phone in the facility. Therefore, the facility exceeds compliance with this part of the standard during this audit. 115.51 (b) Broward Sheriff's Office provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Broward Sheriff's Office, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The Broward Sheriff's Office has by Memorandum of Understanding provided the address and phone number for Nancy J. Cotterman Center (NJCC) to the inmates satisfying the requirements of this standard. The auditor successfully tested the phone system during the facility tour. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.51 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. All staff, volunteers, and contractors have been trained in the mandatory reporting laws in the State of Florida; all confirmed this practice during interviews. This philosophy was discussed during the review of the agency's PREA investigation files with the agency's PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.51 (d) Joseph V. Conte staff may privately report sexual abuse and sexual harassment to the Broward County Sheriff's Office Internal Affairs Division or the PREA external telephone number. Informational posters are located throughout all facilities including common areas, administration areas, and inmate housing areas. This information includes the telephone number and address of the Nancy J. Cotterman Center (NJCC). Interviews with random staff corroborated this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52	**Exhaustion of administrative remedies**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Based on interviews with random and targeted inmates, random staff interviews, auditor observations, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 2-3), interview with the PREA Coordinator, the Inmate Handbook, and information in the OAS; the following delineates the audit findings regarding this standard:

115.52 (a) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During the past twelve months, Joseph V. Conte has not received any filed grievance concerning sexual abuse. An interview with the PREA Coordinator confirms this process. The facility complies with this section of the standard.

115.52 (b) The Broward County Sheriff's Office does not impose a time limit on when offenders/detainees may submit a grievance regarding an allegation of sexual abuse. An interview with the PREA Coordinator confirms this practice. During the past twelve months, Joseph V. Conte has not had any grievance filed concerning sexual abuse; this was confirmed by the PREA Coordinator. Therefore, the agency complies with this section of the standard.

115.52 (c) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states the agency will ensure that offenders/detainees alleging sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During the past twelve months, Joseph V. Conte has not had any grievance filed concerning sexual abuse; this was confirmed by the PREA Coordinator. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint. Therefore, the agency complies with this section of the standard.

115.52 (d) According to Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require it, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for the reply,

	including any properly noticed extension, the offenders/detainee complainant may consider the absence of a response to be a denial at this level. During the past twelve months, Joseph V. Conte has not had any grievance filed concerning sexual abuse; this was confirmed by the PREA Coordinator. Interview with the PREA Coordinator reiterates this process; therefore, the agency is found to comply with section of the standard. 115.52 (e) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) pages 14 and 15, states third parties including fellow offenders/detainees, staff members, family members, attorneys, and outside advocates, shall be permitted to assist offenders/detainees in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of offenders/detainees. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision. During the past twelve months, Joseph V. Conte has not had any grievance concerning sexual abuse. The PREA Coordinator confirmed this process. During the onsite audit, the auditor observed: - whether signage throughout the facility can be easily read/accessed by persons in the facility - signage is provided in English and translated into Spanish and Creole - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. - whether kiosks were operational. - the third-party reporting process by personally testing the method provided to the public. There were no issues noted. Therefore, the agency compiles with this section of the standard. 115.52 (f) The Broward County Sheriff's Office General Order 10.6.002 states when an offender/detainee is subject to a substantial risk of imminent threat of sexual abuse, the offender/detainee may file a grievance through the grievance process on the kiosk system and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent potential sexual abuse. Corrective and protective action must be pursued promptly. Broward County Sheriff's Office Policy 11.1 Prison Rape

	Elimination Act (PREA) pages 14 and 15, mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During the past twelve months, Joseph V. Conte has not had any grievance filed concerning sexual abuse. An interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.

115.53	**Inmate access to outside confidential support services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward Sheriff's Office practices, the PREA Manager interview, staff interviews, inmate interviews, Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC), auditor observations, and documentation review; the following delineates the audit findings regarding this standard: 115.53 (a) The agency has entered into a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) which agrees to provide confidential outside victim advocacy services to the inmates at Broward Sheriff's Office. The mailing address and telephone number for this agency are made available to all inmates at the facility. Broward Sheriff's Office enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The auditor successfully tested the phone system. The person who answered the call, took the auditor through the process if an actual inmate had contacted them for assistance. The Sexual Assault Representative stated they did utilize the bi-lingual employees if they received a call from a limited English Proficient inmate. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Inmates are given this information upon intake on the Orientation Checklist. Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (pages 22-23) outlines this process. During the onsite portion of the audit, the auditor: - tested access via phones by calling the outside emotional support service provider(s) in the same manner that a person confined in the facility would be expected to call - assessed whether all persons confined in the facility have regular access to phones to contact the outside emotional support service provider(s), including persons confined in restricted housing, and have reasonable accommodations - assessed how the facility provides access to phones that are unmonitored or allow for privacy - assessed the accessibility of writing material and the inmate mail process

	There were no deficiencies noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (b) Broward Sheriff's Office informs 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. All calls to the Nancy J. Cotterman Center (NJCC) are not recorded. This was confirmed by the PREA Manager. NJCC contact information includes: · Call the Nancy J. Cotterman Center at (954) 761-RAPE (7273) · Write a letter to Nancy J. Cotterman Center 400 N.E. 4th Street, Fort Lauderdale, FL 33301 Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.53 (c) Broward Sheriff's Office maintains a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.54	**Third-party reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the auditor's observations, the review of Broward Sheriff's Office practices as well as a review of the agency website outlining third-party reporting; the following delineates the audit findings regarding this standard: 115.54 (a) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 16) mandates that Broward Sheriff's Office provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the facility's website at: https://www.sheriff.org. Methods include; mailing a letter to the Sheriff, mailing a letter to Broward County, mailing a letter to the South Florida Center against Sexual Abuse, or calling the facility directly. The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. A review of PREA investigation files revealed that all PREA allegations were made verbally to staff or via the hotline. During the onsite portion of the audit, the auditor observed: - whether signage throughout the facility can be easily read/accessed by persons in

	the facility - signage language is clear and easy to understand - signage is provided in English and translated into Spanish and Creole - the signage text size, formatting, and physical placement accommodate most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc. - whether the information on the signage is accurate and consistent throughout the facility - where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. There were no deficiencies noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61	**Staff and agency reporting duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), Sexual Abuse Incident Check Sheet 14-2C, contracted medical and mental health staff, Agency-wide PREA Coordinator, and the Joseph V. Conte PREA Manager interviews, and documentation provided, the following delineates the audit findings regarding this standard: 115.61 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), 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, whether or not it is part of Broward Sheriff's Office; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All random staff interviewed confirmed this process. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15) stipulates that Joseph V. Conte requires apart from reporting to designated supervisors or officials, staff 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. This was reiterated during an interview with Joseph V. Conte PREA Manager. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (c) Broward Sheriff's Office requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Contracted medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentially, at the initiation of services. This was confirmed during interviews with two WellPath staff; each confirmed their knowledge of mandatory reporting laws in the state of Florida. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 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, the Broward Sheriff's Office reports the allegation to the designated state or local services agency. This was confirmed by the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.61 (e) Broward Sheriff's Office reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to PREA Investigators as required. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfound and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.62	**Agency protection duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.62 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at Joseph V. Conte is subject to a substantial risk of imminent sexual abuse. The review of seven PREA investigation files clearly illustrated that everyone from line staff, intermediate supervisors, and the PREA Incident Review Team plays specific roles in dealing with PREA allegations. The Joseph V. Conte Facility maintains an updated “PREA Alerts” list at all times in the jail Management system; this list is made available to all staff charged with the duty of housing movements. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63	**Reporting to other confinement facilities**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), PREA Manager, PREA Coordinator, three PREA Investigator interviews, and notification documentation provided; the following delineates the audit findings regarding this standard: 115.63 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Broward Sheriff’s Office that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. This process is documented in a memorandum. A documentation review revealed that one such notification has occurred during the past twelve months. This process was corroborated during interviews with the Joseph V. Conte PREA Manager and the three PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. A documentation review revealed that one such notification has occurred during the past twelve months. Therefore, the facility demonstrated compliance with this part of

	the standard during this audit. 115.63 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates that upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Broward Sheriff's Office; the allegation is referred immediately to PREA Investigators to be investigated. This was confirmed during interviews with the PREA Coordinator and the three PREA Investigators. The PREA Investigators stated they have not received any notification from another agency in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64	**Staff first responder duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 17-19), staff interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.64 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit.

	115.64 (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 17) mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of two contract employees. All random staff interviews confirmed staff is trained on their role and responsibility as first responders. A first responder was also interviewed at Joseph V. Conte; it was clear the first responder understood the process as it is outlined in Broward County 11.1 policy. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.65	**Coordinated response**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews, and documentation provided, the following delineates the audit findings regarding this standard: 115.65 (a) Broward Sheriff's Office Policy 11.1 Prison Rape Elimination Act (PREA) (page 19) has a very comprehensive written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, contracted medical and mental health practitioners, designated agency PREA investigators, PREA Coordinator, Joseph V. Conte PREA Manager, and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with multiple Incident Review Team members confirmed their knowledge of the response plan. Each officer post has a PREA Response Booklet; the booklet outlines the major themes of the agency PREA policy, along with a detailed guide for responding to sexual abuse allegations. Therefore, the facility exceeds compliance with this part of the standard during this audit.

115.66	**Preservation of ability to protect inmates from contact with abusers**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), interviews with the facility leadership, and the PREA Coordinator, collective bargaining agreement, and documentation provided; the following delineates the audit findings regarding this standard: 115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Broward Sheriff's Office policies on sexual abuse and sexual harassment. The Broward Sheriff's Office has not entered into any collective bargaining agreements during this audit cycle. This was confirmed during an interview with the facility leadership and PREA Coordinator. The Federation of Public Employees – A Division of the National Federation of Public and Private Employees (AFL-CE0) agreement has specific language outlining the disciplinary sanctions for members involved with PREA incidents. Nothing in this standard shall restrict the entering into or renewal of agreements that govern: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76; or (2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated. Therefore, the agency demonstrated compliance with this part of the standard during this audit.

115.67	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 21-22), staff interviews, inmate interviews, Retaliation Monitor interview, PREA Retaliation Monitoring Report, and documentation provided; the following delineates the audit findings regarding this standard: 115.67 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) policy to protect all inmates and staff at Joseph V. Conte who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and designates which staff members or departments are charged with monitoring retaliation. Monitoring is

	documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with the designated Retaliation Monitor who is also the facility's PREA Manager. A retaliation monitoring document was reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (b) Broward Sheriff's Office has multiple protection measures, such as housing changes or transfers for inmates, victims, or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Joseph V. Conte PREA Manager is the designated Retaliation Monitor for the Joseph V. Conte Facility. Monitoring is documented on the PREA Retaliation Monitoring Report. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit. 115.67 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) calls for at least 90 days following a report of sexual abuse, Broward Sheriff's Office monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. The Joseph V. Conte Retaliation Monitor monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. Monitoring is documented on the PREA Retaliation Monitoring Report. This was confirmed during an interview with the designated Retaliation Monitor. A retaliation monitoring example was reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.67 (d), (e), (f) If any other individual who cooperates with an investigation expresses a fear of retaliation, Joseph V. Conte takes appropriate measures to protect that individual against retaliation. Broward County's obligation to monitor shall terminate if the inmate is released from custody. This was confirmed during an interview with the designated Retaliation Monitor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.68	**Post-allegation protective custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12), segregation staff interviews, PREA Manager interviews, inmate interviews, and documentation provided; the following delineates the audit findings regarding this standard: 115.68 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 12) states that Broward Sheriff's Office prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. Interviews with the Joseph V. Conte PREA Manager and the Joseph V. Conte segregation staff revealed that involuntary segregation has not been used for this purpose in the past twelve months at Joseph V. Conte. The Joseph V. Conte PREA Manager stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71	**Criminal and administrative agency investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), Broward County Records Retention Schedule, investigative staff interviews, training certificates, investigative reports, Collective Bargaining Agreement, Florida State Statute 112.532 (Law Enforcement and Corrections Officer Bill of Rights, as well as interviews with the PREA Investigators, Internal Affairs Investigators, PREA Coordinator, and the PREA Compliance Managers, the following delineates the audit findings regarding this standard: 115.71 (a) Broward County Sheriff's Office PREA investigators conduct an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. Broward Sheriff's Office has a multiple-layered investigation approach for Staff-on-Inmate Sexual Abuse allegations as a result of Florida State Statute 112.532, which states "the contents of the complaint and investigation shall remain confidential until such time as the employing law enforcement agency makes a final determination whether or not to issue a notice of disciplinary action consisting of suspension with a loss of pay, demotion, or dismissal. If an allegation of sexual abuse by staff-on-inmate is made, the potential criminal component takes priority, the allegation will immediately be forwarded to the Sex Crimes Unit, then Internal Affairs, and then back to the agency PREA Investigator for final review. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations;

	one was unfound and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. The investigative files were reviewed and it appeared that the investigations were conducted promptly, documented thoroughly, and objectively for all allegations, including third-party, and anonymous reports. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (b) Based on training curriculums provided, PREA investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Training records indicated that all thirteen designated PREA Criminal Investigators and all eleven Administrative PREA Investigators have specialized training. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (c) Broward County Sheriff's Office PREA Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. This was confirmed during three interviews with three PREA investigators. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 20) stipulates, when the quality of evidence appears to support a criminal prosecution, Broward Sheriff's Office refers the case to the Broward County Sheriff's Office Criminal Investigations Division for the criminal investigation. This was confirmed during three interviews with three PREA investigators. The Joseph V. Conte Detention

	Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as an inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. This was confirmed during interviews with three agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (f) Broward Sheriff's Office administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. This was confirmed during interviews with three agency PREA investigators. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (g) Broward Sheriff's Office criminal investigations are documented by the Broward County Sheriff's Office Criminal Investigations Division in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfound and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.71 (h) The Broward Sheriff's Office refers all allegations to the Broward County Sheriff's Office Criminal Investigations Division for investigation and prosecution when warranted. This was confirmed in the investigation file review and during interviews with three agency PREA investigators. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (i) The Broward Sheriff's Office retains all written reports for as long as the alleged abuser is incarcerated or employed by the Broward Sheriff's Office, plus five years. This is stipulated in the Broward County Records Retention Schedule. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (j) The departure of the alleged abuser or victim from employment or control of the Broward Sheriff's Office or agency does not provide a basis for terminating an investigation. This was confirmed during interviews with three agency PREA investigators. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfound and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (k) The Broward County Sheriff's Office Criminal Investigator conducts criminal sexual abuse investigations pursuant to the requirements of this standard. This was confirmed during interviews with three agency PREA investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.71 (l) Broward Sheriff's Office refers all criminal cases to the Broward County Sheriff's Office Criminal Investigator and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the Broward County Sheriff's Office Criminal Investigator and the Joseph V. Conte Command Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) and three PREA investigative staff interviews; the following delineates the audit findings regarding this standard: 115.72 Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) states the Broward Sheriff's Office imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. This was reiterated during interviews with three PREA investigators. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), Inmate PREA Allegation Notification Memorandum provided, and staff interviews; the following delineates the audit findings regarding this standard: 115.73 (a) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification Memorandum. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be

unsubstantiated. The lead auditor reviewed all seven investigation files. Five examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Broward County Sheriff's Office, in order to inform the inmate as required by this standard. Broward Sheriff's Office outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Broward Sheriff's Office practice and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

(1) The staff member is no longer posted within the inmate's unit;

(2) The staff member is no longer employed at the facility;

(3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Broward Sheriff's Office; or

(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Broward Sheriff's Office

The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Notification memorandum. Two examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22), following an inmate's allegation they had been sexually abused by another inmate, Broward Sheriff's Office subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or Joseph V. Conte staff learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the Broward Sheriff's Office Inmate/Detainee PREA Allegation Notification Memorandum. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment

	investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Five examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (e) All such notifications or attempted notifications are documented on the Broward Sheriff's Office Inmate/Detainee PREA Notification Memorandum. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Five examples were reviewed by the auditor. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.73 (f) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 22) outlines the agency's obligation to report under this standard terminates if the inmate is released from Broward Sheriff's Office's custody. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit.

115.76	**Disciplinary sanctions for staff**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), documentation provided, and PREA Coordinator interview; the following delineates the audit findings regarding this standard. 115.76 (a) and (b) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) stipulates that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. The PREA Coordinator advised the facility has not disciplined or terminated any staff in the past twelve months for sexual abuse allegations. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was

	determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.76 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that 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 PREA Coordinator advised the facility has not disciplined or terminated any staff in the past twelve months for sexual abuse allegations. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit. 115.76 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) mandates that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement unless the activity was clearly not criminal, and to any relevant licensing bodies. The PREA Coordinator advised the facility has not disciplined or terminated any staff in the past twelve months for sexual abuse allegations. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77	**Corrective action for contractors and volunteers**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), the documentation provided, facility leadership, and PREA Coordinator interviews; the following delineates the audit findings regarding this standard. 115.77 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement unless the activity was clearly not criminal, and to relevant licensing bodies. During the past twelve months, there have not been any PREA incidents at the Joseph V. Conte Facility involving a contractor or volunteer. This was confirmed during file review and during an interview with the PREA Coordinator. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.77 (b) Broward Sheriff's Office takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During the past twelve months, there have not been any PREA incidents at the Joseph V. Conte Facility involving a contractor or volunteer. This was confirmed during file review and during an interview with the PREA Coordinator. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon a review of Broward County Policy 11.1 Prison Rape Elimination Act

	(PREA) (pages 24-25), the documentation provided, Facility Leadership, contracted mental health staff, and Joseph V. Conte PREA Manager interviews; the following delineates the audit findings regarding this standard: 115.78 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), policy states that inmates/detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse (detainee on detainee) or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's or detainee's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. This was confirmed during interviews with Facility Leadership and the PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24) states that the disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. This was confirmed during interviews with contracted mental health staff and the Joseph V. Conte PREA Manager. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (d) The contracted mental health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Broward Sheriff's Office does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. This was confirmed during interviews with the Joseph V. Conte Detention Facility PREA Manager and contracted mental health staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (e) Broward Sheriff's Office disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (f) Policy 11. 1 Prison Rape Elimination Act (page 25) states 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. This was confirmed during interviews with Facility Leadership and the Joseph V. Conte PREA Manager. During file review, it was determined that no inmate had been charged criminally in the past twelve months as a result of a PREA investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.78 (g) Broward Sheriff's Office prohibits all sexual activity between inmates and may discipline inmates for such activity. This was confirmed during interviews with Facility Leadership and the PREA Manager. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit.

115.81	**Medical and mental health screenings; history of sexual abuse**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath HCD=100_F-05 Response to Sexual Abuse- Broward FL Policy page 5, contracted medical and mental health staff interviews and documentation provided; the following delineates the audit findings regarding this standard: 115.81 (a) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (b) The Broward County Sheriff's Office does not operate a prison. Therefore, the facility is exempt from this part of the standard during this audit. 115.81 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) and the WellPath HCD=100_F-05 Response to Sexual Abuse- Broward FL Policy page 5 mandates if the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Broward Sheriff's Office ensures the mate is offered a follow-up meeting with contracted mental health staff within 14 days of the intake screening as required by this part of the standard. The Classification Staff shall document the referral to the WellPath Mental Health Staff. A medical records review produced two such referrals. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.81 (d) Broward Sheriff's Office requires that any information related to sexual victimization or abusiveness that occurred in the facility is strictly limited to medical and mental health practitioners and other Joseph V. Conte staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded, and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.81 (e) Broward Sheriff's Office requires WellPath Medical and Mental Health Staff to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility unless the inmate is under the age of 18. This was confirmed during an interview with the two WellPath Staff. During the past twelve months, there has not been a situation where consent from an inmate under the age of 18 has occurred. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82	**Access to emergency medical and mental health services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 23), Memorandum of Understanding with Nancy J. Cotterman Center (NJCC), and documentation provided; the following delineates the audit findings regarding this standard: 115.82 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 23), states that Broward Sheriff's Office has a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC) to treat inmate victims of sexual abuse. The facility also has WellPath medical and mental health staff at the facility ensuring inmates 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. This was confirmed during interviews with two contract medical and mental health staff. The

	Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (b) Broward Sheriff's Office has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. Victims will be assessed by Nancy J. Cotterman Center staff (NJCC). This was confirmed during WellPath medical and mental health staff interviews. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, Joseph V. Conte demonstrated compliance with this part of the standard during this audit. 115.82 (c) Broward Sheriff's Office ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. This is done in cooperation with the Nancy J. Cotterman Center (NJCC) and Central Florida Center against Sexual Abuse. This was confirmed during WellPath medical and mental health staff interviews. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.82 (d) Broward County Policy 11.1 Prison Rape Elimination Act (page 23), states that Broward Sheriff's Office requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Broward County Sheriff's Office bears all costs. This was confirmed during WellPath medical and mental health staff interviews. The Joseph V. Conte Detention Facility received

	seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83	**Ongoing medical and mental health care for sexual abuse victims and abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on WellPath medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, WellPath HCD-100_F-06 Response to Sexual Abuse-Broward FL Policy page 8, and documentation provided; the following delineates the audit findings regarding this standard: 115.83 (a) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff’s Office to offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. This was confirmed during an interview with the two WellPath medical staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (b) Broward County Sheriff's Office Policy 11.1 Prison Rape Elimination Act (page 23) requires Broward Sheriff’s Office that the evaluations 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. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff’s Office. This was confirmed during interviews with the WellPath medical staff. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.83 (c) Broward Sheriff's Office requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Follow-up care is done in cooperation between Nancy J. Cotterman Center (NJCC) and Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Staff and the PREA Manager for the Joseph V. Conte Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (d and e) Based on Broward Sheriff's Office documentation requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC), and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Medical Staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (f) Broward Sheriff's Office requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Medical Staff. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.83 (g) Broward Sheriff's Office requires that medical and mental health staff provide treatment services to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Follow-up care is done in cooperation between the Nancy J. Cotterman Center (NJCC) and the Broward County Sheriff's Office. This was confirmed during interviews with the WellPath Medical and Mental Health Staff. The Joseph V. Conte Detention Facility received seven PREA allegations in the past twelve months; all seven were thoroughly investigated. There were five inmate-on-inmate sexual abuse investigations; four were deemed unsubstantiated and one was determined to be unfounded. There were two inmate-on-inmate sexual harassment investigations; one was unfounded and the other was deemed to be unsubstantiated. The lead auditor reviewed all seven investigation files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	115.83 (h) Broward Sheriff's Office shall 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 WellPath mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86	**Sexual abuse incident reviews**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator and the PREA Manager, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, the Sexual Abuse or Assault Incident Review Form, Incident Tracking Log, and documentation provided; the following delineates the audit findings regarding this standard: 115.86 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy mandates that Broward Sheriff's Office conducts 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. This was confirmed during file review and during interviews with two Incident Review Team Members. The review is documented on the Bureau of Investigations and Projects Unit PREA Review Meeting form. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (b) Broward Sheriff's Office ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the Bureau of Investigations and Projects Unit PREA Review Meeting form. This was confirmed during an interview with the PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.86 (c) The review team consists of upper-level management officials, with input from line supervisors, PREA investigators, all PREA Managers, the PREA Coordinator, and contracted medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit. There are typically 25-30 attendees at each incident review meeting. There were three such reviews in the past twelve months. All attendees are listed on the Investigations and

	Projects Unit PREA Review Meeting form. 115.86 (d) The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in Broward Sheriff's Office where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. The agency has deployed an effective PREA after-action review form which addresses all elements of the standard. Therefore, this meets this portion of the standard. 115.86 (e) Broward Sheriff's Office shall implement the recommendations for improvement, or shall document its reasons for not doing so. Each of the three 30-day reviews clearly marked recommendations as deemed appropriate by the Incident Review Team. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87	**Data collection**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.87 (a), (b) and (c) Broward Sheriff's Office 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 aggregates the incident-based sexual abuse data at least annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy mandates that the incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The Broward County Sheriff's Office did submit a Survey of Sexual Violence to the Department of Justice in 2019. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) stipulates the Broward Sheriff's Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (e) Broward Sheriff's Office does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.87 (f) Upon request, Broward Sheriff's Office provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. The Broward County Sheriff's Office did submit a Survey of Sexual Violence to the Department of Justice in 2019. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88	**Data review for corrective action**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Managers, the agency's website, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25), and documentation provided; the following delineates the audit findings regarding this standard: 115.88 (a) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy (page 25) specifies that Broward Sheriff's Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective

	action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Broward Sheriff's Office as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (b) Such reports include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the Broward Sheriff's Office's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (c) Broward Sheriff's Office's collective report is approved by the Sheriff and made readily available to the public through its website https://www.sheriff.org Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.88 (d) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 25), states that Broward Sheriff's Office may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted. Therefore, the Joseph V. Conte Facility demonstrated compliance with this part of the standard during this audit.

115.89	**Data storage, publication, and destruction**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, the PREA Manager, and the documentation provided; the following delineates the audit findings regarding this standard: 115.89 (a) through (d) : Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy mandates Broward Sheriff's Office PREA Coordinator to make all aggregated sexual abuse data, readily available to the public at least annually through the agency website https://www.sheriff.org. All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. This was confirmed during interviews with the PREA Manager and the agency-wide PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.401 (a) and (b) The Joseph V. Conte Facility did have a PREA audit during the first and second audit cycles. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (h) The auditor has full access to all locations/areas in the Joseph V. Conte Facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (i) The auditor did obtain all necessary copies of Joseph V. Conte Facility audit items. Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (m) The auditor was allowed to interview Joseph V. Conte inmates in a private setting. Before each interview, inmates were informed of: - their right to not speak to the audit team - a brief summary of the purpose of the PREA audit - the fact that the audit team would not ask any personal questions - the audit team background (including the team's independent contractor status) - the confidentiality requirements of the audit team and their name would not be in the facility's report - their right to be from retaliation for speaking to the audit team - how to report any such retaliation from speaking to the audit team - the availability of mental health staff if the conversation brought back bad memories or flashbacks from the past.

	Therefore, the facility demonstrated compliance with this part of the standard during this audit. 115.401 (n) The auditor did not receive a letter from a Joseph V. Conte inmate/ detainee, staff member, or citizen. Audit notices were observed in every housing unit, as well as all common areas. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.403	**Audit contents and findings**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 Each of the Broward County Sheriff’s Office facilities (North Broward, Joseph V. Conte, Mail Jail, and Paul Rein) had a PREA audit in 2021; the final report is posted on the agency’s website.

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

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	**Supervision and monitoring**	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	**Supervision and monitoring**	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	**Supervision and monitoring**	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	**Youthful inmates**	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	**Youthful inmates**	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	**Youthful inmates**	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	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 if the	na

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate’s genital status?	yes
	If an inmate’s genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	**Limits to cross-gender viewing and searches**	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	**Hiring and promotion decisions**	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	**Upgrades to facilities and technologies**	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	na
115.22 (a)	**Policies to ensure referrals of allegations for investigations**	

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	**Employee training**	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	**Employee training**	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	**Volunteer and contractor training**	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	**Volunteer and contractor training**	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	**Inmate education**	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	**Inmate education**	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	**Inmate education**	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	**Specialized training: Investigations**	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective	yes

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	**Staff and agency reporting duties**	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	**Staff and agency reporting duties**	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators?	yes
115.62 (a)	**Agency protection duties**	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	**Reporting to other confinement facilities**	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	**Staff first responder duties**	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	**Preservation of ability to protect inmates from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

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

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

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	**Reporting to inmates**	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	**Reporting to inmates**	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

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

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	**Disciplinary sanctions for inmates**	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	**Disciplinary sanctions for inmates**	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	**Disciplinary sanctions for inmates**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	**Disciplinary sanctions for inmates**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	**Disciplinary sanctions for inmates**	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	**Disciplinary sanctions for inmates**	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	**Disciplinary sanctions for inmates**	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	na
115.81 (b)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na
115.81 (c)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

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

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	**Data collection**	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	**Data review for corrective action**	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	

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

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes