

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

Final Report

Date of Report: July 10, 2021

Auditor Information

Name: Brian D. Bivens	Email: briandbivens@gmail.com
Company Name: Brian D. Bivens and Associates	
Mailing Address: P.O. Box 51787	City, State, Zip: Knoxville, TN 37950
Telephone: 865-789-1037	Date of Facility Visit: April 26-30, 2021

Agency Information

Name of Agency: Broward Sheriff's Office		Governing Authority or Parent Agency (If Applicable): Broward Sheriff's Office	
Physical Address: 555 SE 1st Avenue		City, State, Zip: Fort Lauderdale, FL 33301	
Mailing Address: Same		City, State, Zip:	
The Agency Is:	Military	Private for Profit	Private not for Profit
Municipal	X County	State	Federal
Agency Website with PREA Information: https://www.sheriff.org			

Agency Chief Executive Officer

Sheriff Gregory Tony

Email: Gregory_Tony@sheriff.org Telephone:

Agency-Wide PREA Coordinator

Name: Lieutenant Catherine Cummings

Email: Catherine_Cummings@sheriff.org Telephone: 954 410-7075

PREA Coordinator Reports to:
Lieutenant Colonel Timothy Langelier

Number of Compliance Managers who report to the PREA Coordinator
6

Facility Information

Name of Facility: Central Intake Bureau, Main Jail Bureau, Joseph V. Conte Facility, North Broward Bureau, Paul Rein Detention Facility

Physical Address: 555 SE 1st Avenue

City, State, Zip: Fort Lauderdale, Florida, 33301

Mailing Address (if different from above):

City, State, Zip:

The Facility Is:

Military

Private for Profit

Private not for Profit

Municipal

County

State

Federal

Facility Type:

Prison

Jail

Facility Website with PREA Information: <https://www.sheriff.org>

Has the facility been accredited within the past 3 years? Yes No

If the facility has been accredited within the past 3 years, select the accrediting organization(s) – select all that apply (N/A if the facility has not been accredited within the past 3 years):

ACA

NCCHC

CALEA

Other (please name or describe: FCAC

If the facility has completed any internal or external audits other than those that resulted in accreditation, please describe:

Sheriff/Sheriff/Sheriff/Director

Name: Colonel Josefa Benjamin

Email: Josefa_Benjamin@sheriff.org

Telephone: 954-831-5907

Facility PREA Compliance Manager

Name: Lieutenant Jean-Baptiste, Lieutenant Philpart, Lieutenant McCook, Lieutenant Wilkin, Lieutenant Aronofsky

Email:

Telephone:

Facility Health Service Administrator N/A

Name: Yusimir Arencibia

Email: Yusimir_Arencibia@Sheriff.org

Telephone: 954-831-5905

Facility Characteristics

Designated Facility Capacity:	Joseph V. Conte- 1,328, North Broward Bureau- 1,200, Paul Rein Facility- 1,020, Main Jail Bureau- 1,538	
Current Population of Facility:	Joseph V. Conte – 901, North Broward – 776, Paul Rein – 585, and Mail Jail – 1,181 Total 3443	
Average daily population for the past 12 months:	3150	
Has the facility been over capacity at any point in the past 12 months?	Yes <input checked="" type="checkbox"/> No	
Which population(s) does the facility hold?	Females Males <input checked="" type="checkbox"/> Both Females and Males	
Age range of population:	16-91	
Average length of stay or time under supervision:	53.42	
Facility security levels/inmate custody levels:	Minimum-Maximum Custody	
Number of inmates admitted to facility during the past 12 months:	21,522	
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:	9,309	
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:	4,853	
Does the facility hold youthful inmates?	<input checked="" type="checkbox"/> Yes No	
Number of youthful inmates held in the facility during the past 12 months: (N/A if the facility never holds youthful inmates)	14	
Does the audited facility hold inmates for one or more other agencies (e.g. a State correctional agency, U.S. Marshals Service, Bureau of Prisons, U.S. Immigration and Customs Enforcement)?	<input checked="" type="checkbox"/> Yes No	
Select all other agencies for which the audited facility holds inmates: Select all that apply (N/A if the audited facility does not hold inmates for any other agency or agencies):	Federal Bureau of Prisons <input checked="" type="checkbox"/> U.S. Marshals Service <input checked="" type="checkbox"/> U.S. Immigration and Customs Enforcement Bureau of Indian Affairs U.S. Military branch State or Territorial correctional agency <input checked="" type="checkbox"/> County correctional or detention agency Judicial district correctional or detention facility <input checked="" type="checkbox"/> City or municipal correctional or detention facility Private corrections or detention provider Other - please name or describe: Click or tap here to enter text. N/A	
Number of staff currently employed by the facility who may have contact with inmates:	1173	
Number of staff hired by the facility during the past 12 months who may have contact with inmates:	114	

Number of contracts in the past 12 months for services with contractors who may have contact with inmates:	13
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	783
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	193
Physical Plant	
<p>Number of buildings:</p> <p>Auditors should count all buildings that are part of the facility, whether inmates are formally allowed to enter them or not. In situations where temporary structures have been erected (e.g., tents) the auditor should use their discretion to determine whether to include the structure in the overall count of buildings. As a general rule, if a temporary structure is regularly or routinely used to hold or house inmates, or if the temporary structure is used to house or support operational functions for more than a short period of time (e.g., an emergency situation), it should be included in the overall count of buildings.</p>	5
<p>Number of inmate housing units:</p> <p>Enter 0 if the facility does not have discrete housing units. DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors, etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house inmates of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows inmates to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units.</p>	5144
Number of single cell housing units:	407
Number of multiple occupancy cell housing units:	1506
Number of open bay/dorm housing units:	43
Number of segregation cells (for example, administrative, disciplinary, protective custody, etc.):	244
In housing units, does the facility maintain sight and sound separation between youthful inmates and adult inmates? (N/A if the facility never holds youthful inmates)	X Yes No N/A
Does the facility have a video monitoring system, electronic surveillance system, or other monitoring technology (e.g. cameras, etc.)?	X Yes No
Has the facility installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology in the past 12 months?	X Yes No

Medical and Mental Health Services and Forensic Medical Exams	
Are medical services provided on-site?	<input checked="" type="checkbox"/> Yes No
Are mental health services provided on-site?	<input checked="" type="checkbox"/> Yes No
Where are sexual assault forensic medical exams provided? Select all that apply.	<input checked="" type="checkbox"/> On-site Local hospital/clinic Rape Crisis Center Other (please name or describe: Click or tap here to enter text.)
Investigations	
Criminal Investigations	
Number of investigators employed by the agency and/or facility who are responsible for conducting CRIMINAL investigations into allegations of sexual abuse or sexual harassment:	14
When the facility received allegations of sexual abuse or sexual harassment (whether staff-on-inmate or inmate-on-inmate), CRIMINAL INVESTIGATIONS are conducted by: Select all that apply.	<input checked="" type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators An external investigative entity
Select all external entities responsible for CRIMINAL INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for criminal investigations)	<input checked="" type="checkbox"/> Local police department <input checked="" type="checkbox"/> Local sheriff's department State police A U.S. Department of Justice component Other (please name or describe: Click or tap here to enter text.) N/A
Administrative Investigations	
Number of investigators employed by the agency and/or facility who are responsible for conducting ADMINISTRATIVE investigations into allegations of sexual abuse or sexual harassment?	10
When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-inmate or inmate-on-inmate), ADMINISTRATIVE INVESTIGATIONS are conducted by: Select all that apply	<input checked="" type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators An external investigative entity
Select all external entities responsible for ADMINISTRATIVE INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for administrative investigations)	<input checked="" type="checkbox"/> Local police department <input checked="" type="checkbox"/> Local sheriff's department State police A U.S. Department of Justice component Other (please name or describe: Click or tap here to enter text.) N/A

Audit Findings

Audit Narrative

The onsite PREA audit of the Broward Sheriff's Office, was conducted April 26-30, 2021, by Department of Justice Certified PREA Auditor Brian D. Bivens and Fred Chinn. A pre-audit visit was completed by PREA Auditor Brian D. Bivens on March 15th and 16th, 2021. The Broward Sheriff's Office is located in Fort Lauderdale, Florida. Fort Lauderdale is a popular tourist area on Florida's Southeastern coast; it is located approximately 25 miles north of Miami. The 2019 census estimates the population is 182,427; however, it is estimated there are approximately 13 million tourists that visit the area annually. The area has approximately 4,000 restaurants, 560 hotels, 63 golf courses and over 100 marinas housing some 45,000 resident yachts. Fort Lauderdale is named after a series of forts built during the Second Seminole War and is specifically named for Major William Lauderdale.

The auditor wishes to extend his deepest appreciation to Major Kevin Corbett and his staff for their professionalism, hospitality, and kindness. The auditor also wishes to compliment the Broward Sheriff's Office's Sgt. Howard Martzall, Tricia Vaccaro, Tom Trawinski and Michelle Heller, and Deputy Imani Gary for their outstanding work in organizing the files that were provided to the auditor in advance of the audit. This enabled the audit to move forward very efficiently.

The facility supplied a list of resident names sorted by housing units, disabilities, and special designations, as well as a list of facility staff names to the auditor. From these lists the auditor selected, at random, a sampling of residents and staff to be interviewed during the on-site visit. The sampling size for residents included at least one resident from every floor. This decision was made to ensure all residents throughout the facility were receiving the same information and education related to all aspects of the PREA program instituted at this facility.

The on-site audit began with an entrance meeting being conducted on Monday, April 26, 2021 at 08:30 a.m. in the Roll Call Room. The following staff attended the entrance meeting:

DOD ADMINISTRATION & MANAGEMENT

Colonel Josefa Benjamin, Executive Director

Lieutenant Colonel Tim Langelier, Director Administration & Operations

Lieutenant Joseph Lunga Executive Officer to Administration and Operations

Darren Sieger, Assistant Director Detention Management

Tonya Cheatham, Detention Classification Manager

Yusimir Arencibia, Inmate Healthcare Manager

Dr. Timothy E. Ludwig, Inmate Mental Health Manager

Dr. Andrew Gross, System wide Behavioral Health Director

DOD MAJORS

Acting Major Jose Acosta, Assistant Director North Operations

Major Elsie Judon, Assistant Director South Operations

Major Kevin Corbett, Assistant Director Administration

Main Jail Bureau - South Operations

Captain Eddison Ricketts
Admin XO Lt. Jenny McCook
Ops XO Lt. Kerwin Hankerson

Central Intake Bureau- South Operations

Captain Karen Archibald
XO Lt. Adrienne Philpart

Courts/ Confinement Status - South Operations

Captain Carter Huber
XO Lt. Latresha President

North Broward Bureau - North Operations

Captain Yolanda Williams
XO Lt. Melvin Wilkin
XO Lt. Kenneth Cooper

Paul Rein Facility - North Operations

Captain Tellerferro Isaac
XO. Lt. Daphnys Jean-Baptiste

Joseph V. Conte Facility- North Operations

Captain George Sanchez
XO Lt. Richard Aronofsky

Investigations and Projects Unit

XO. Lt. Catherine Cummings
Sergeant Howard Martzall
Deputy Michelle Heller
Deputy Thomas Trawinski
Deputy Imani Gary

Following the entrance meeting, the auditor conducted a comprehensive site review that began at approximately 09:00 a.m. and continued throughout the onsite visit. During the site review the auditor reviewed camera placement, blind spots, staff placement and documentation to assist in determining standard compliance. While touring the facilities the auditor observed the notices of this PREA audit in all the buildings (notices were also located on all Securus Kiosks in every housing unit, as well as posters that called attention to the agency's Zero Tolerance Policy and how to report allegations of sexual abuse and sexual harassment). Posters were visible in English, Creole and Spanish. Random staff and resident interviews were conducted in a private office provided. The following staff accompanied the auditor on the site review:

Major Kevin Corbett, Assistant Director Administration

XO. Lt. Catherine Cummings

Sergeant Howard Martzall
 Deputy Michelle Heller
 Deputy Thomas Trawinski
 Deputy Imani Gary
 XO. Lt. Kerwin Hankerson
 XO. Lt. Jenny McCook
 XO. Lt. Adrienne Philpart
 Captain Karen Archbald

Chart 1 - Housing Areas Toured

	Joseph V. Conte	North Broward	Paul Rein	Main Facility
Administrative Area	X	X	X	X
Intake/Release	X	X	X	X
Kitchen	N/A	N/A	N/A	X
Laundry	X	N/A	N/A	X
Inmate Programs	X	X	X	N/A
Recreation Yard	X	X	X	X
General Population	X	X	X	X
Segregation	X	X	X	X
Juvenile Housing	N/A	N/A	X	N/A
Control Room	X	X	X	X
Maintenance	X	N/A	N/A	N/A
Commissary	N/A	N/A	N/A	N/A
Infirmary	N/A	X	N/A	X
Loading Dock	X	N/A	X	N/A
Court Holding	N/A	N/A	N/A	X
Visitation	X	X	X	X
Warehouse				X

All housing units, day rooms, resident program areas, work areas, and all other resident accessible areas were toured (**CHART 1**). While touring several residents and staff were questioned about their knowledge of PREA standards, procedures for reporting, services available, and their responsibilities. All staff and residents informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment, and/or retaliation for reporting. The auditor found the staff to be well versed in their duties as PREA 1st Responders.

The auditor interviewed a total of one hundred and sixty-four staff members, contractors and/or volunteers during the course of this audit (**CHART 2**). All staff interviewed was well versed in their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards.

Chart 2 - Staff/Contractor/Volunteer Interviews (164)

Interview Type	Admin	Joseph V. Conte	North Broward	Paul Rein	Main Facility	Total
Volunteer	N/A	N/A	N/A	N/A	N/A	0
Contractor	0	0	2	0	0	2
Supervisor	N/A	3	2	2	3	10
1 st Responder	N/A	0	1	0	1	2
Agency Head/Designee	1	N/A	N/A	N/A	N/A	1
Facility Head/Designee	1	N/A	N/A	N/A	N/A	1
Medical Staff	1	1	2	0	0	4
Mental Health Staff	0	0	2	0	0	2
PREA Coordinator	1	N/A	N/A	N/A	N/A	1
PREA Manager	N/A	1	1	1	1	4
1 st Shift Random Staff	N/A	10	10	10	10	40
2 nd Shift Random Staff	N/A	10	10	10	10	40
3 rd Shift Random Staff	N/A	10	10	10	10	40
PREA Investigator	1	N/A	N/A	N/A	N/A	1
Screening Staff	0	1	1	1	2	5
Human Resources	1	N/A	N/A	N/A	N/A	1
Training Staff	3	N/A	N/A	N/A	N/A	3
Juvenile Staff	N/A	N/A	N/A	2	N/A	2
Segregation Staff	N/A	0	2	0	2	4
Contract Monitor	1	N/A	N/A	N/A	N/A	1

TOTAL 164

There is no SAFE or SANE staff at the facility; they are made available through a Memorandum of Understanding with the Nancy J. Cotterman Center (NJCC). Exams would be performed in a private medical exam room inside the appropriate Broward County Correctional Facility. There was one SANE exam conducted in the last twelve months. Staff interviewed was well versed in their responsibilities in reporting sexual abuse, sexual harassment, staff negligence, and retaliation for reporting. The Nancy J. Cotterman Center (NJCC) also acts the external reporting agency. Inmates can simply dial 954-761-7273 on any inmate phone, and they are quickly connected to a Victim Advocate. The internal hotline is posted on every inmate phone in the facility. Inmates can dial 954-831-3775; the investigators will be immediately notified on their county issued cellular phones. The system was successful tested during the initial tour of the facility.

There were one-hundred and thirty inmates interviewed during the on-site visit (**CHART 3**). These residents consisted of: fifty-seven general population inmates and seventy-three targeted.

Chart 3 - Inmate Interviews (130)

Interview Type	Joseph V. Conte	North Broward	Paul Rein	Main Facility	Total
General Population	15	10	15	17	57
Juvenile	0	0	8	0	8
Limited English Proficient	6	6	0	0	12
Blind/Low Vision	0	1	0	0	1
Deaf/Hearing Impaired	0	1	0	0	1
Self-Identified as LGBTQ	1	1	0	7	9
Cognitive Impairment	1	10	0	4	15
Physical Disability	3	3	4	0	10
Reported Sexual Abuse	1	0	1	6	8
Screened at Risk of Victimization	3	2	2	2	9

All of the inmates interviewed acknowledged receiving PREA training and written materials in languages that they could comprehend (posters, pamphlets, and resident handbooks) outlining the agencies zero tolerance policies towards sexual abuse, sexual harassment, and retaliation for reporting, as well as the procedures for reporting. There were fourteen inmates did not remember if they had watched the PREA orientation video utilized for the more in depth training. Intake files did show fourteen inmates had signed a form acknowledging they had watched the video. Twelve 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. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and that all PREA complaints were taken very serious by staff at this facility.

The auditor selected and carefully examined thirty human resource files, thirty staff training files, four contractor and thirty volunteer human resource files (**CHART 4**). The human resource and volunteer files were very well organized and contained all the necessary background check information and signed statements regarding previous sexual misconduct described in the standards. The training records were also very complete and included written documentation that staff and volunteers received the required training and understood what was being trained. It was clear the Training Division and the Investigations Projects Unit thoroughly covers all aspects of PREA during their training sessions.

Chart 4 – File Review

Inmate Files	30
Employee Human Resource Files	30
Employee Training Records	30
Volunteer Human Resource Files	30
Volunteer Training Records	N/A Due to Covid
Contractor Human Resource Files	4
Contractor Training Records	4
Specialized PREA Investigator Training Records	4
Specialized PREA Medical/Mental Health Training Records	4
PREA Investigation Files	33

The auditor also reviewed thirty offender files and saw documentation of offender education, as well as documentation of the initial risk screenings, and screenings upon additional information being completed as required by the standard.

In the 12 months preceding the audit, the Broward Sheriff's Office had received and investigated thirty-three PREA complaints (**CHART 5**) regarding sexual harassment and/or sexual abuse. During the investigation each case was either determined to be unfounded, unsubstantiated or substantiated based on each merit, investigation findings and evidentially standards. All investigative files were reviewed during the on-site visit and appeared to document thoroughly the investigative process per agency policy. Policy was followed and documented for inmate notification, incident review and retaliations monitoring. Policy and procedure required that criminal investigative referrals were to be documented and proper referrals were made as warranted.

Chart 5 - PREA Investigation Files from the past 12 months (33)

IOI or SOI	TYPE	Outcome	Prosecution/SANE/MODE/ Incident	Inmate Ret		
				Review	Notified	Monitor
Inmate on Inmate	Sexual Harassment	Substantiated	No No STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No Yes HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No STAFF	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No 3rd PARTY	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No 3rd PARTY	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No 3rd PARTY	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No No HOTLINE	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No No STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No KIOSK	No	Yes	Yes

Staff on Inmate	Sexual Abuse	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes

There were two allegations made by inmates that occurred at other correctional facilities; file review showed both allegations were forwarded to the appropriate jail administration.

At the conclusion of the on-site visit, an exit meeting was held on Friday, April 30, 2021 at 1300 in the Mail Jail Roll Call Room to discuss the audit findings. The following staff attended:

DOD ADMINISTRATION & MANAGEMENT

Colonel Josefa Benjamin, Executive Director
Lieutenant Colonel Tim Langelier, Director Administration & Operations
Lieutenant Joseph Lungha Executive Officer to Administration and Operations
Darren Sieger, Assistant Director Detention Management

Tonya Cheatham, Detention Classification Manager
Yusimir Arencibia, Inmate Healthcare Manager
Dr. Timothy E. Ludwig, Inmate Mental Health Manager
Dr. Andrew Gross, System wide Behavioral Health Director

DOD MAJORS

Acting Major Jose Acosta, Assistant Director North Operations
Major Elsie Judon, Assistant Director South Operations
Major Kevin Corbett, Assistant Director Administration

Main Jail Bureau - South Operations

Captain Eddison Ricketts
Admin XO Lt. Jenny McCook
Ops XO Lt. Kerwin Hankerson

Central Intake Bureau- South Operations

Captain Karen Archibald
XO Lt. Adrienne Philpart

Courts/ Confinement Status - South Operations

Captain Carter Huber
XO Lt. Latresha President

North Broward Bureau - North Operations

Captain Yolanda Williams
XO Lt. Melvin Wilkin
XO Lt. Kenneth Cooper

Paul Rein Facility - North Operations

Captain Telliferro Isaac
XO. Lt. Daphnys Jean-Baptiste

Joseph V. Conte Facility- North Operations

Captain George Sanchez
XO Lt. Richard Aronofsky

Investigations and Projects Unit

XO. Lt. Catherine Cummings
Sergeant Howard Martzall
Deputy Michelle Heller

Deputy Thomas Trawinski
Deputy Imani Gary

Facility Characteristics

Joseph V. Conte Facility Opened in May 1999, the Joseph V. Conte Facility is a male, medium-custody facility housing mainly inmates awaiting trial. Conte is a direct supervision facility, meaning deputies are stationed inside the housing units and interact directly with inmates. The Conte Facility is program intensive and includes 30-day substance abuse programs, as well as various educational programs. The facility has 122 cameras; it is Occularis digital camera system. The PREA Investigation Unit has access to all cameras in their office area.

Shift Hours: Alpha Shift 1100-0700
 Bravo Shift 0700-1500
 Charlie Shift 1500-1100

Name	Capacity	Gender	Custody Level
A1	72	Male	NA/AA Program & Minimum GP
A2	72	Male	Inmate Worker & Minimum GP
A3	72	Male	Medium GP
A4	72	Male	Minimum GP
A5	72	Male	Life Skills Program & Minimum GP
A6	72	Male	Substance Abuse Program
A7	72	Male	Medium GP / Cohort
A8	72	Male	Cohort
B1	94	Male	Medium GP
B2	94	Male	Medium GP
B3	94	Male	Medium GP
B4	94	Male	Minimum GP
B5	94	Male	Spiritual Learning Program
B6	94	Male	Minimum GP
B7	94	Male	Cohort
B8	94	Male	Cohort

GP=General Population

North Broward Bureau is a minimum to medium security, special needs detention facility housing male and female offenders. The primary mission of the facility is to house and manage the mentally ill, medically infirm and special needs inmate population. The facility also houses protective custody female offenders. The facility has operated on its present site since 1979. The facility has 206 cameras.

Shift Hours: Alpha Shift 1100-0700
 Bravo Shift 0700-1500
 Charlie Shift 1500-1100

Name	Capacity	Gender	Custody Level
11A1	35	Male	Medium GP
11A2	18	Male	Quarantine
11A3	18	Male	Quarantine
11A4	35	Male	Inmate Worker
11A5	35	Male	Medium GP
11B1	35	Male	Disciplinary Segregation
11B2	35	Male	Inmate Worker/GP
11B3	35	Male	Medium GP
11B4	35	Male	Medium GP
11C1	35	Male	Medium GP
11C2	18	Male	Sex Offenders
11C3	18	Male	Cohort
11C4	35	Male	Medium GP
11C5	35	Male	Medium GP
11D1	35	Male	Residential Housing
11D2	35	Male	Sex Offenders
11D3	35	Male	Medium GP
11D4	35	Male	Minimum GP
121E1	6	Male	Sex Offenders
121E2	6	Male	Residential Housing
121E3	14	Male	Suicide Watch
121E4	21	Male	Residential Housing
121E5	21	Male	Residential Housing
121F1	6	Male	Residential Housing
121F2	6	Male	Residential Housing
121F3	14	Male	Residential Housing
121F4	21	Male	Medical Stepdown
121F5	21	Male	Medical Stepdown
121G1	6	Female	Mental Health
121G2	6	Female	Residential Housing
121G3	14	Female	Residential Housing
121G4	21	Female	Residential Housing
121G5	21	Female	Sex Offenders
121H1	6	Male	Residential Housing
121H2	6	Male	Residential Housing
121H3	14	Male	Residential Housing

121H4	21	Male	Mental Health
121H5	21	Male	Residential Housing
121E1	5	Male	Residential Housing
121E2	4	Male	Residential Housing
121E3	14	Male	Residential Housing
121E4	21	Male	Residential Housing
121E5	21	Male	Medium Non-violent felons/misd
122F1	6	Male	Mental Health
122F2	6	Male	Mental Health
122F3	14	Male	Residential Housing
122F4	21	Male	Residential Housing
122F5	21	Male	Programs
122G1	3	Female	Residential Housing
122G2	5	Female	Residential Housing
122G3	14	Female	Residential Housing
122G4	21	Female	Juvenile
122G5	21	Female	Residential Housing
122H1	4	Male	Residential Housing
122H2	6	Male	Residential Housing
122H3	14	Male	TPU
122H4	21	Male	Residential Housing
122H5	21	Male	Maximum Custody
12MM1	6	Male	Medical
12MM2	11	Male	Medical
12MM3	7	Male	Medical
12MM4	11	Male	Medical
12MM OBS	8	Male	Medical
12MW1	16	Female	Detox
12MW2	16	Female	Residential Housing
12MW3	16	Female	Special Needs
12MW4	16	Female	Residential Housing
12MW OBS	7	Female	Medical

Paul Rein Detention Facility opened in February 2004 with a direct supervision jail approach where staff work more closely with inmates and inmate movement is kept to a minimum. Designed to handle 1,020 inmates in two four-story towers, the 257,790 square foot medium / maximum security jail houses male and female inmates in separate areas. The BSO In-Custody Behavioral Services Division operates both a Substance Abuse Program and Life Skills Program for inmates at the Paul Rein Detention Facility. These programs promote pro-social attitudes and behavior change in an effort to reduce criminal behavior. Additionally, the Chaplain's Office operates a Lifestyles Spiritual Unit. The Paul Rein Facility also includes an average of 12 juveniles awaiting trial in adult courts; they are housed separately from adult inmates. The facility has 104 cameras.

Shift Hours: Alpha Shift 1100-0700
 Bravo Shift 0700-1500
 Charlie Shift 1500-1100

Name	Capacity	Gender	Custody Level
C1	72	Female	Maximum GP
C2	72	Female	Cohort
C3	76	Female	Medium GP
C4	28	Female	Ad. Seg and Disciplinary Seg.
C5	20	Male	Juvenile
C6	64	Female	Medium GP
C7	64	Male	Residential Housing
C8	64	Male	Weekender/GP/GED
C9	64	Female	SAP/Life Skills/Female Lifestyle
D1	72	Male	Medium/Disc. Seg
D2	72	Male	Medium GP
D3	72	Male	Medium GP
D4	72	Male	Medical Isolation
D5	64	Male	Minimum GP
D6	64	Male	Medium GP
D7	64	Male	Child Offenders
D8	64	Male	Child Offenders

The Main Jail Bureau is an eight-story maximum security facility adjacent to the Broward County Courthouse in downtown Fort Lauderdale. Built in 1985 at a cost of \$41.6 million, it was originally designed to house 864 local and state inmates. In 1988 and again in 1992, capacity was expanded to 1,538 inmates. More than 400 sworn and civilian staff supervise the facility which also includes Central Intake Bureau (Booking) for all Broward County law enforcement agencies, pre-magistrate, Centralized Classification Intake assessment for all BSO detention facilities, an infirmary and administrative offices.

An all-male facility, (excluding females in transit) most inmates are awaiting trial or sentencing, or are serving terms of less than one year. The inmates housed in the Main Jail are considered escape risks, violent or dangerous, or by the nature of their charges require maximum security housing. The facility has 250 cameras.

Shift Hours: Alpha Shift 1100-0700
 Bravo Shift 0700-1500
 Charlie Shift 1500-1100

Name	Capacity	Gender	Custody Level
2B1	30	Female	Intake Housing
2B2	6	Female	Intake Housing
2B3	6	Female	Mental Health Observation
2B4	30	Male	Intake Housing
2C1	30	Male	Intake Housing
2C2	6	Male	M.H. Transitional
2C3	6	Male	Intake Housing
2D4	30	Male	Intake Housing
Infirmary	30	Male	Infirmary
4A1	15	Male	Protective Custody
4A2	24	Male	Detox
4A3	30	Male	Detox
4B1	30	Male	Transitional/Cohort
4B2	24	Male	Transitional/Cohort
4B3	30	Male	Transitional/Cohort
4C1	30	Male	Transitional/Cohort
4C2	24	Male	Transitional/Cohort
4C3	30	Male	Transitional/Cohort
4D1	29	Male	Medium GP
4D2	24	Male	Inmate Workers
4D3	30	Male	Protective Custody
5A1	30	Male	Medium GP
5A2	12	Male	Disciplinary Segregation
5A3	30	Male	Child Offenders
5B1	30	Male	Medium GP
5B2	24	Male	Child Offenders
5B3	30	Male	Medium GP
5C1	30	Male	Maximum GP
5C2	24	Male	Medium GP
5C3	30	Male	Maximum

5D1	15	Male	Medical Isolation
5D2	12	Male	Medical Isolation
5D3	15	Male	Medical Isolation
6A1	30	Male	Disciplinary Segregation
6A2	12	Male	Protective Custody
6A3	30	Male	Maximum GP
6B1	30	Male	Disciplinary Segregation
6B2	24	Male	Maximum GP
6B3	30	Male	Disciplinary Segregation
6C1	30	Male	Maximum GP
6C2	24	Male	Maximum GP
6C3	30	Male	Maximum GP
6D1	30	Male	Maximum GP
6D2	24	Male	Maximum GED
6D3	30	Male	Maximum GP
7A1	30	Male	Maximum GP
7A2	24	Male	Maximum GP
7A3	30	Male	Maximum GP
7B1	30	Male	Maximum GP
7B2	24	Male	Maximum GP
7B3	30	Male	Maximum GP
7C1	30	Male	Maximum GP
7C2	24	Male	Administrative Segregation
7C3	30	Male	Maximum GP
7D1	15	Male	Administrative Segregation
7D2	12	Male	Administrative Segregation
7D3	30	Male	Administrative Segregation
8B1	15	Male	Administrative Segregation
8B2	6	Male	Administrative Segregation
8B3	6	Male	Administrative Segregation
8B4	16	Male	Administrative Segregation
8C1	15	Male	Administrative Segregation
8C2	6	Male	Administrative Segregation
8C3	6	Male	Administrative Segregation
8C4	15	Male	Administrative Segregation

Summary of Audit Findings

This facility has successfully met the necessary requirements for re-certification.

Standards Exceeded

Number of Standards Exceeded: 2

List of Standards Exceeded: 115.15 and 115.61

Standards Met

Number of Standards Met: 43

List of Standards Met: 115.11, 115.12, 115.13, 115.14, 115.16, 115.17, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.41, 115.42, 115.43, 115.51, 115.52, 115.53, 115.54, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, 115.403

Standards Not Met

Number of Standards Not Met: 0

List of Standards Not Met: N/A

PREVENTION PLANNING

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

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

115.11 (a)

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

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? Yes No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? Yes No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?
 Yes No

115.11 (c)

- If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) Yes No NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)
 Yes No NA

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

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

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Based on the documentation provided: as well as, interview with the Agency-wide PREA Coordinator, and 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) which mandates a 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. This was evident during the onsite tour, interviews with inmates and staff. 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. Lt. Cummings was appointed as the agency-wide PREA Coordinator. The agency provided the auditors with the organizational chart showing the PREA Coordinator position as an upper-level, agency-wide position, Lt. Cummings reports directly to Major Kevin Corbett, Assistant Director Administration. Lt. Cummings is very knowledgeable of the PREA standards and actively assists the facility with compliance. Lt. Cummings has the authority to develop, implement, and oversee PREA compliance. She is actively updating the facility as new Frequently Ask Questions (FAQ's) results are published on the PREA Resource Center website. The Broward Sheriff's Office Sheriff appointed Lt. Jean-Baptiste, Lt. Philpart, Lt. McCook, Lt. Wilkins, and Lt. Aronofsky as PREA Managers for their respective facilities.

During interviews with the PREA Coordinator and the PREA Compliance Managers, all 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 a PREA Compliance Coordinator and a PREA Compliance Manager for each facility. Therefore, this standard was found to be in compliance during this audit.

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

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

115.12 (a)

- If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) Yes No NA

115.12 (b)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on the documentation provided: as well as, interview with the Random Staff, PREA Coordinator and PREA Managers, 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 be in compliance during this audit.

Standard 115.13: Supervision and monitoring

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

115.13 (a)

- Does the 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- 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 No

- 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 No
- 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 No
- 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 No NA
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards? Yes No
- 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 No
- In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors? Yes No

115.13 (b)

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

115.13 (c)

- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? Yes No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? Yes No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? Yes No

115.13 (d)

- Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? Yes No
- Is this policy and practice implemented for night shifts as well as day shifts? Yes No

- Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on staff interviews, review of documentation provided and review of the Broward Sheriff's Office staffing analysis (January 19, 2021), 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 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 the standard 115.13 (a) to include the physical layout of the facility, 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. 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 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 interview with the 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 for signature and 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 approved by the Federation of Public Employees. The last Annual Staffing Plan assessment was completed on January 19, 2021. 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 are required to conduct and are documenting UNANNOUNCED rounds on all shifts

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

Standard 115.14: Youthful inmates

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

115.14 (a)

- Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

115.14 (b)

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

115.14 (c)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on the auditor observation, documentation provided, 11.1 Prison Rape Elimination Act (PREA), Classification Housing, work and Programs Plan, interviews with the Major, PREA Coordinator, PREA Manager and staff interviews, the Broward Sheriff's Office does house youthful offenders. The following delineates the audit findings regarding 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. 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. This was verified during interviews with eight youthful detainees and observations by the auditors during the outside visit. 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. Such detainees will be separated by sight, sound and physical contact with the adult inmate/detainee population. Broward County Housing Plan outlines the daily activities for youthful detainees, including educations services and recreation times. The auditor reviewed the daily activity schedule for the juvenile inmates. This was verified during interviews with eight youthful detainees and random staff interviews, and observations by the auditors during the outside visit. Females are housed at North Broward and male juveniles are housed at Paul Rein. 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 PREA Managers it was determined that there has 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.15: Limits to cross-gender viewing and searches

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

115.15 (a)

- Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?
 Yes No

115.15 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)
 Yes No NA
- Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.) Yes No NA

115.15 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? Yes No
- Does the facility document all cross-gender pat-down searches of female inmates? (N/A if the facility does not have female inmates.) Yes No NA

115.15 (d)

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

115.15 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? Yes No
- If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? Yes No

115.15 (f)

- Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No
- Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA), training curriculums, staff interviews, training file reviews, 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 cross gender strip searches are prohibited except in exigent circumstances and must be documented when conducted. Transgender inmates are asked 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 12 months. 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 inmate interviews.

115.15 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13) prohibits frisk/pat searches of the 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 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 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 while 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.

115.15 (e) Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 13), 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 LBGTI inmates 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 BCSO lesson plan. Transgender inmates are asked their gender preference for pat downs; this is documented on form BSO DJ 82, Statement of Search Preference. During interview with the LBGTI inmates, it was confirmed that the inmates felt the staff conducts proper searches. There were also no complaints filed by the LBGTI inmates in the past 12 months related to searches. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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

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

115.16 (a)

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect,

and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? Yes No

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes)? Yes No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? Yes No
- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Are blind or have low vision? Yes No

115.16 (b)

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

115.16 (c)

- Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward Sheriff's Office practice, review of the lesson plans, and review of Language Line agreement, 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 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 Correct Care Solutions with the Language Line Services. The facility also makes available TDD phones at each facility. The facility has an enormous amount 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. 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 inmates 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. 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 assistant 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 a PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. The facility also makes TDD phone in each facility. Broward County has a large amount 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 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. This was confirmed during interviews with First Responders, the PREA Managers and the PREA Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.17: Hiring and promotion decisions

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

115.17 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No

- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No

115.17 (b)

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

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency perform a criminal background records check? Yes No
- Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? Yes No

115.17 (d)

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

115.17 (e)

- Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees? Yes No

115.17 (f)

- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? Yes No
- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? Yes No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? Yes No

115.17 (g)

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

115.17 (h)

- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 4 and 5), Human Resource staff interviews, IA Captain Interview, 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:

- 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

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 review of four human resource files for contract employees. Due to COVID-19, there has not been any volunteers allowed into any BCSO facility since March 2020. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 Broward Sheriff's Office requires a criminal background records check 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:

- 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

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

(c)-2 Broward Sheriff's Office makes their best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegation of sexual abuse. The agency has fourteen Background Investigators. 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 records check 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. Therefore, the facility demonstrated 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 BSO colors while not on duty; specifically when working for another employer. File review showed that thirty out of thirty 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 IA Captain stated there has 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.

Standard 115.18: Upgrades to facilities and technologies

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

115.18 (a)

- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

115.18 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward Sheriff's Office physical plant, Policy 11.1 Prison Rape Elimination Act (PREA), staff interviews and 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. During this audit cycle, there were substantial enhancements to the video technology at this 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.

115.18 (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 substantial enhancements to the video technology at this 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.

RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

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

115.21 (a)

- If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)
 Yes No NA

115.21 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA
- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

115.21 (c)

- Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate? Yes No

- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? Yes No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? Yes No
- Has the agency documented its efforts to provide SAFEs or SANEs? Yes No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? Yes No
- If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency *always* makes a victim advocate from a rape crisis center available to victims.) Yes No NA
- Has the agency documented its efforts to secure services from rape crisis centers? Yes No

115.21 (e)

- As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? Yes No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? Yes No

115.21 (f)

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

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency *always* makes a victim advocate from a rape crisis center available to victims.) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 20-21), investigative staff interviews, and 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 of Investigations and Projects Unit 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 was one inmate who alleged sexual abuse that constituted the need for a SANE exam. The exam was conducted. At the conclusion of the investigation, the PREA Investigator determined the allegation to be unfounded. 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 advocacies 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 advocacies services to the inmates upon request. Interviews with multiple Broward Sheriff's Office 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 during review of all PREA investigation files from the past twelve months. 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 due to the fact BSO 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. Therefore, this part of the standard is not applicable to this facility.

Standard 115.22: Policies to ensure referrals of allegations for investigations

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

115.22 (a)

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

115.22 (b)

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

115.22 (c)

- If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).) Yes No NA

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 19-20) investigative staff interviews, and 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 Broward Sheriff's Office. There were seven 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 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 investigation to the designated Broward County Sheriff's Office PREA investigator. 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.

TRAINING AND EDUCATION

Standard 115.31: Employee training

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

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? Yes No
- Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? Yes No
- Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment Yes No
- Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? Yes No
- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? Yes No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? Yes No
- Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? Yes No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? Yes No

115.31 (b)

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

- Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa? Yes No

115.31 (c)

- Have all current employees who may have contact with inmates received such training?
 Yes No
- Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures? Yes No
- In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies? Yes No

115.31 (d)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on the review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 6-7) staff interviews, random staff training file review and review of documentation provided the National PREA Resource Center's 44 slide PowerPoint- The Prison Rape Elimination Act: Overview of the Law and Your Role. sign-in sheets, signed acknowledgement 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 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 male and female gender of the inmates at Broward Sheriff's Office. 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. All staff receive annual refresher PREA training during in-service according to policy 11.1 which meets the requirements of this standard. Review of thirty employee training files illustrated that all thirty 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. Thirty out of thirty training file reviews confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.32: Volunteer and contractor training

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

115.32 (a)

- Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures? Yes No

115.32 (b)

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

115.32 (c)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon 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 Broward County PREA Overview –Facilitator’s Guide, sign-in sheets, signed acknowledgement 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 –Facilitator’s Guide outlines the training given to all volunteers and contractors. Interviews with two contractors (no volunteers were interviewed due to Covid) 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) The level and type of training provided to volunteers and contractors is based on the services they provide and 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. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.33: Inmate education

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

115.33 (a)

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

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? Yes No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents? Yes No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents? Yes No

115.33 (c)

- Have all inmates received the comprehensive education referenced in 115.33(b)? Yes No
- Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility? Yes No

115.33 (d)

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

- Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? Yes No

115.33 (e)

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

115.33 (f)

- In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on 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. 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. This was confirmed during an interview with the Classification Staff. Therefore, the 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). There were fourteen 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 fourteen inmates had signed a form acknowledging they had watched the video. 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 PREA Coordinator. 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 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 one blind/low vision and one deaf/hard of hearing inmates incarcerated at the time of the onsite visit. Both inmates 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. Twelve 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) Broward Sheriff's Office 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 twelve out of twelve LEP inmates received education information in a Spanish format; all twelve LEP inmates stated they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.34: Specialized training: Investigations

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

115.34 (a)

- In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators 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 No NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a.) Yes No NA
- Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a.) Yes No NA
- Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a.) Yes No NA
- Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a.) Yes No NA

115.34 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a.) Yes No NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on 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 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 Investigator received 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 Investigators have over a three decade of experience each and have attended countless trainings pertaining to their job duties. 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 a three decade of experience and have attended countless trainings pertaining to their job duties. 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 facility 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.

Standard 115.35: Specialized training: Medical and mental health care

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

115.35 (a)

- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (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 No NA
- 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 No NA
- 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 No NA

- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)
 Yes No NA

115.35 (b)

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

115.35 (c)

- Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (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 No NA

115.35 (d)

- 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 No NA
- 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 No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on review of the Broward Sheriff's Office practices, as well as the 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 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. Review of two training records and interviews with two Broward County 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 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. Review of two training records and interviews with two Broward County staff members 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 with Broward County also receive the annual training mandated for all employees, contractors, and volunteers. Review of two training records and interviews with two Broward County staff members confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

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

115.41 (a)

- Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? Yes No
- Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? Yes No

115.41 (b)

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

115.41 (c)

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

115.41 (d)

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?
 Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?
 Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability? Yes No

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes? Yes No

115.41 (e)

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

115.41 (f)

- Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening? Yes No

115.41 (g)

- Does the facility reassess an inmate's risk level when warranted due to a referral? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a request? Yes No
- Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse? Yes No
- 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 No

115.41 (h)

- Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section? Yes No

115.41 (i)

- Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 8-11), inmate and staff interviews, inmate file reviews, 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. Random inmate interviews confirmed this practice. Inmates sign a facility property receipt, indicating they have received the facility's brochure on PREA. Twelve 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 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. 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. This process is documented on (Broward County) Assessment Questionnaire Form Thirty out of thirty Classification files confirmed this practice. Thirty out of thirty inmates remembered being screened upon intake. 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 facility utilizes an objective screening instrument that covers all aspects of this standard. Thirty out of thirty 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. 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. This process is documented on the Broward Sheriff's Office Assessment Questionnaire Form. Thirty out of thirty 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. Three such rescreenings 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, 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.

Standard 115.42: Use of screening information

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

115.42 (a)

- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments? Yes No

115.42 (b)

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

115.42 (c)

- When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the **agency** consider, on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)? Yes No
- When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems? Yes No

115.42 (d)

- Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate? Yes No

115.42 (e)

- Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments? Yes No

115.42 (f)

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

115.42 (g)

- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.) Yes No 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 decree, legal settlement, or legal judgement.) Yes No 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 solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 11), 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 during an interview with the PREA Managers. 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) 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 during an interview with the PREA Managers. 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 case by case basis as required by this standard. Based on interview with the nine 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 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 nine 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 Managers always inquire 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 interview 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 facility, a multi-disciplinary team reviews the inmates housing, programming and worker status based on the inmates 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 nine self-identified LBGTI inmates confirmed during interview with this auditor being given the opportunity to shower separately. The decision for housing and programs placement for a transgender inmate is documented on the Broward Sheriff's Office's 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.

Standard 115.43: Protective Custody

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

115.43 (a)

- Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? Yes No
- If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? Yes No

115.43 (b)

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? Yes No
- If the facility restricts 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 No NA

- If the facility restricts any 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 No NA
- If the facility restricts any 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 No NA

115.43 (c)

- Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? Yes No
- Does such an assignment not ordinarily exceed a period of 30 days? Yes No

115.43 (d)

- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document the basis for the facility's concern for the inmate's safety? Yes No
- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document the reason why no alternative means of separation can be arranged? Yes No

115.43 (e)

- In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 11-12), staff interviews, 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. 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.

115.43 (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 Broward Sheriff's Office restricts access to programs, privileges, education, or work opportunities, 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 PREA Managers. 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. 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.

REPORTING

Standard 115.51: Inmate reporting

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

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment? Yes No
- Does the agency provide multiple internal ways for inmates to privately report retaliation by other inmates or staff for reporting sexual abuse and sexual harassment? Yes No

- Does the agency provide multiple internal ways for inmates to privately report staff neglect or violation of responsibilities that may have contributed to such incidents? Yes No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? Yes No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? Yes No
- Does that private entity or office allow the inmate to remain anonymous upon request? Yes No
- Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility *never* houses inmates detained solely for civil immigration purposes) Yes No NA

115.51 (c)

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

115.51 (d)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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: the 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 in all common areas in English, Creole, and Spanish outlining the multiple processes in which inmate can report sexual abuse and/or sexual harassment. 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 (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 collaborated during review of the agency's PREA investigation files. 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 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). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.52: Exhaustion of administrative remedies

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

115.52 (a)

- Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. Yes No

115.52 (b)

- Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (c)

- Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (d)

- Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) Yes No NA
- If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) Yes No NA
- At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (e)

- Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)
 Yes No NA

- Are those third parties also permitted to file such requests on behalf of inmates? (If a third-party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.) Yes No NA

- If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)
 Yes No NA

115.52 (f)

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

- After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)
 Yes No NA

- After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.) Yes No NA

- After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)
 Yes No NA

- Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA

- Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA

- Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (g)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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, Broward County Sheriff's Office has not received any filed grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this process. The agency is in compliance 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. 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 12 months, Broward County Sheriff's Office has not had any grievance filed concerning sexual abuse. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint. 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, 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 reply, including any properly noticed extension, the offenders/detainees complainant may consider the absence of a response to be a denial at this level. During the past 12 months, Broward County Sheriff's Office has not had any grievance filed concerning sexual abuse. Interview with the PREA Coordinator reiterates this process; therefore the agency is found to be in compliance 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 offenders/detainees decline to have the

request processed on his or her behalf, the agency shall document the offenders/detainees' decision. During the past 12 months, Broward County Sheriff's Office has not had any grievance concerning sexual abuse. The PREA Coordinator confirmed this process. Therefore, the agency complies 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 the 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 12 months, Broward County Sheriff's Office has not had any grievance filed concerning sexual abuse. Interview with the PREA Coordinator confirms this practice; therefore the agency complies with this standard.

Standard 115.53: Inmate access to outside confidential support services

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

115.53 (a)

- Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? Yes No
- Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility *never* has persons detained solely for civil immigration purposes.) Yes No NA
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? Yes No

115.53 (b)

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

115.53 (c)

- Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? Yes No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 advocacies 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. 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 Managers. 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.

Standard 115.54: Third-party reporting

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

115.54 (a)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 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 call 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. Review of PREA investigation files revealed that three investigations were started and completed based on third party reports. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

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

115.61 (a)

- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? Yes No

115.61 (b)

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

115.61 (c)

- Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? Yes No
- Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? Yes No

115.61 (d)

- If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? Yes No

115.61 (e)

- Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 15), Sexual Abuse Incident Check Sheet 14-2C, 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 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. 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 do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions. This was reiterated during an interview with the PREA Managers. 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. Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. This was confirmed during interviews with two Broward County Medical 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, 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 thirty-three PREA investigations confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.62: Agency protection duties

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

115.62 (a)

- When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 the Broward Sheriff's Office is subject to a substantial risk of imminent sexual abuse. The review of thirty-three PREA investigation files clearly illustrated that everyone from line staff, intermediate supervisors and the PREA Incident Review Team play specific roles in dealing with PREA allegations. Broward County maintains an updated "keep separate" list at all times; 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.

Standard 115.63: Reporting to other confinement facilities

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

115.63 (a)

- Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? Yes No

115.63 (b)

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

115.63 (c)

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

115.63 (d)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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:

115.63 (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 Managers and the 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. Documentation review revealed that five 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 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.

Standard 115.64: Staff first responder duties

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

115.64 (a)

- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?
 Yes No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? Yes No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? Yes No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? Yes No

115.64 (b)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 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 of a first responder. Two first responders were also interviewed; it was clear each understand the process as it is outlined in Broward County 11.1 policy. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.65: Coordinated response

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

115.65 (a)

- Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? Yes No

Auditor Overall Compliance Determination

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

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

Instructions for Overall Compliance Determination Narrative

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

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

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

115.66 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? Yes No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 agency head and PREA Coordinator. The Federation of Public Employees – A Division of the national Federation of Public and Private Employee (AFL-CEO) agreement has specific language outlining the disciplinary sanctions for members involved with PREA incidents. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.67: Agency protection against retaliation

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

115.67 (a)

- Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? Yes No
- Has the agency designated which staff members or departments are charged with monitoring retaliation? Yes No

115.67 (b)

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

115.67 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? Yes No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? Yes No

115.67 (d)

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

115.67 (e)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?
 Yes No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

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) Broward County 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 PREA Retaliation Monitoring Report. 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 PREA Retaliation Monitoring Report. 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 PREA Retaliation Monitoring Report. 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, 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.

Chart 5 - PREA Investigation Files from the past 12 months (33)

IOI or SOI	TYPE	Outcome	Prosecution/SANE/MODE/ Incident	Inmate	Ret	Review		Notified Monitor	
Inmate on Inmate	Sexual Harassment	Substantiated	No No STAFF	Yes	Yes	Yes	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No KIOSK	Yes	Yes	Yes	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No STAFF	Yes	Yes	Yes	Yes	Yes	Yes

Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No Yes	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	KIOSK	Yes Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No	3rd PARTY	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	3rd PARTY	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	3rd PARTY	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No No	HOTLINE	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No	KIOSK	No Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No No	STAFF	Yes Yes Yes

Standard 115.68: Post-allegation protective custody

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

115.68 (a)

- Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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 Managers and segregation staff revealed that involuntary segregation has not been used for this purpose in the past 12 months. The PREA Manger 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.

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

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

115.71 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] Yes No NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] Yes No NA

115.71 (b)

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

115.71 (c)

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

115.71 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? Yes No

115.71 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? Yes No
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? Yes No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? Yes No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? Yes No

115.71 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? Yes No

115.71 (h)

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

115.71 (i)

- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? Yes No

115.71 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? Yes No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (l)

- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of the Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 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 consist 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 for 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 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, 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 reviewed so that all Sex Crimes Detectives, all Internal Affairs Investigators, all PREA Managers, and all PREA Investigators have specialized training. 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. 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 criminal prosecution, Broward Sheriff's Office refers the case to the Broward County Sheriff's Office Criminal Investigations Division for the criminal investigation. 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 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. 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. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) Broward Sheriff’s Office refers all allegations to the Broward County Sheriff’s Office Criminal Investigations Division for investigation and prosecution when warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (i) Broward Sheriff’s Office retains all written reports for as long as the alleged abuser is incarcerated or employed by 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. 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. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Chart 5 - PREA Investigation Files from the past 12 months (33)

IOI or SOI	TYPE	Outcome	Prosecution/SANE/MODE/	Incident	Inmate	Ret	
						Review	Notified Monitor
Inmate on Inmate	Sexual Harassment	Substantiated	No No STAFF		Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No KIOSK		Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No STAFF		Yes	Yes	Yes

Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No Yes	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	KIOSK	Yes Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No	3rd PARTY	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	3rd PARTY	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	3rd PARTY	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No No	HOTLINE	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	HOTLINE	No Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No	KIOSK	No Yes Yes
Staff on Inmate	Sexual Abuse	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No Yes Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes Yes Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No No	STAFF	Yes Yes Yes

Standard 115.72: Evidentiary standard for administrative investigations

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

115.72 (a)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21) and investigative staff interviews; the following delineates the audit findings regarding this standard:

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 an interview with the PREA Investigator and evident during PREA Investigation File reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.73: Reporting to inmates

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

115.73 (a)

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

115.73 (b)

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

115.73 (c)

- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, 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 inmate whenever: The staff member is no longer posted within the inmate's unit? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, 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 inmate whenever: The staff member is no longer employed at the facility? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, 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 inmate whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, 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 inmate whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? Yes No

115.73 (d)

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

115.73 (e)

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

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 21), Inmate/Detainee 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. 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. 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 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 Memorandum. 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 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 (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.

Chart 5 - PREA Investigation Files from the past 12 months (33)

IOI or SOI	TYPE	Outcome	Prosecution/SANE/MODE/	Incident	Inmate		
					Review	Notified	Ret Monitor
Inmate on Inmate	Sexual Harassment	Substantiated	No No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No Yes	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No No	3rd PARTY	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No No	3rd PARTY	Yes	Yes	Yes

Staff on Inmate	Sexual Harassment	Unfounded	No	No	3rd PARTY	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No	No	HOTLINE	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No	No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No	No	KIOSK	No	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

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

115.76 (a)

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

115.76 (b)

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

115.76 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories? Yes No

115.76 (d)

- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)? Yes No
- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

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

Standard 115.77: Corrective action for contractors and volunteers

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

115.77 (a)

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

115.77 (b)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review of Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (page 24), documentation provided, agency head, 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

Broward County involving a contractor or volunteer. 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 Broward County involving a contractor or volunteer. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.78: Disciplinary sanctions for inmates

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

115.78 (a)

- Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process? Yes No

115.78 (b)

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

115.78 (c)

- When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior? Yes No

115.78 (d)

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

115.78 (e)

- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? Yes No

115.78 (f)

- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? Yes No

115.78 (g)

- 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 No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based upon review Broward County Policy 11.1 Prison Rape Elimination Act (PREA) (pages 24-25), 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. 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. 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. 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. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

MEDICAL AND MENTAL CARE

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

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

115.81 (a)

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

115.81 (b)

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

115.81 (c)

- If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? Yes No

115.81 (d)

- Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?
 Yes No

115.81 (e)

- Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on 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 with 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 with this part of the standard during this audit.

115.81 (c) Broward County Policy 11.1 Prison Rape Elimination Act (PREA) 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 inmate is offered a follow-up meeting with 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), Broward County Mental Health Staff. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (e) Broward Sheriff's Office requires Broward County 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

Standard 115.82: Access to emergency medical and mental health services

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

115.82 (a)

- Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?
 Yes No

115.82 (b)

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

115.82 (c)

- Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? Yes No

115.82 (d)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? Yes No

Auditor Overall Compliance Determination

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

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

Based on Broward County 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 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. 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 to Nancy J. Cotterman Center staff (NJCC). Therefore, the facility 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 contra ception 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. 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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

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

115.83 (a)

- Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? Yes No

115.83 (b)

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

115.83 (c)

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

115.83 (d)

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

115.83 (e)

- If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. *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 No NA

115.83 (f)

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

115.83 (g)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? Yes No

115.83 (h)

- If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)
 Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on Broward County medical and mental health staff interviews, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, and 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 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 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 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 for the Broward County Sheriff's Office. 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 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 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 requires that medical and mental health staff provide treatment services 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. 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 Health Services Administrator. 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 mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

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

115.86 (a)

- Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded? Yes No

115.86 (b)

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

115.86 (c)

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

115.86 (d)

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse? Yes No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility? Yes No

- Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? Yes No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? Yes No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? Yes No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager? Yes No

115.86 (e)

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

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on interviews with the PREA Coordinator, the PREA Managers, Broward County Policy 11.1 Prison Rape Elimination Act (PREA) policy, 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 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 Incident Review Team. The review is documented on the 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 Investigations and Projects Unit PREA Review Meeting form. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consist 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. 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 excellent 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 thirteen 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.

Chart 5 - PREA Investigation Files from the past 12 months (33)

IOI or SOI	TYPE	Outcome	Prosecution/SANE/MODE/			Incident Review	Inmate Notified	Ret Monitor
			No	Yes	Mode			
Inmate on Inmate	Sexual Harassment	Substantiated	No	No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No	Yes	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	KIOSK	Yes	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No	No	3rd PARTY	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	3rd PARTY	Yes	Yes	Yes

Staff on Inmate	Sexual Harassment	Unfounded	No	No	3rd PARTY	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No	No	HOTLINE	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	HOTLINE	No	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No	No	HOTLINE	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Staff on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unfounded	No	No	KIOSK	No	Yes	Yes
Staff on Inmate	Sexual Abuse	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	KIOSK	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unfounded	No	No	STAFF	No	Yes	Yes
Inmate on Inmate	Sexual Harassment	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes
Inmate on Inmate	Sexual Abuse	Unsubstantiated	No	No	STAFF	Yes	Yes	Yes

Standard 115.87: Data collection

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

115.87 (a)

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions? Yes No

115.87 (b)

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

115.87 (c)

- Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice? Yes No

115.87 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews? Yes No

115.87 (e)

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

115.87 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on interviews with the PREA Coordinator, the PREA Managers, 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. 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.

Standard 115.88: Data review for corrective action

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

115.88 (a)

- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas? Yes No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis? Yes No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? Yes No

115.88 (b)

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

115.88 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? Yes No

115.88 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on interviews with the PREA Coordinator, the PREA Managers, 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 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.

Standard 115.89: Data storage, publication, and destruction

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

115.89 (a)

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

115.89 (b)

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

115.89 (c)

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

115.89 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

Based on interviews with the PREA Coordinator, the PREA Manager, and 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

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

115.401 (a)

- During the 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 No

115.401 (b)

- Is this the first year of the current audit cycle? (*Note: a "no" response does not impact overall compliance with this standard.*) Yes No
- If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is **not** the *second* year of the current audit cycle.) Yes No NA
- If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is **not** the *third* year of the current audit cycle.) Yes No NA

115.401 (h)

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

115.401 (i)

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

115.401 (m)

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

115.401 (n)

- Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? Yes No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

115.401 (a) and (b) The Broward Sheriff's Office did have a PREA audit during the first audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (h) The auditor has full access to all location/areas of the Broward Sheriff's Office. 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 auditor was allowed to interview inmates in a private setting. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.401 (n) The auditor did receive six letters from Broward Sheriff's Office inmates/detainees. Each inmate was interviewed by the auditor. 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.

Standard 115.403: Audit contents and findings

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

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. 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 that there has never been a Final Audit Report issued.) Yes No NA

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

115.403 Broward Sheriff's Office has had a PREA audit in 2018; the final 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.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

DOJ Certified Auditor:

Brian D. Bivens

July 10, 2021

Auditor Signature

Date