

PREA Facility Audit Report: Final

Name of Facility: Waiawa Correctional Facility

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 01/05/2026

Auditor Certification

The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Jerri Ann Worm	Date of Signature: 01/05/2026

AUDITOR INFORMATION

Auditor name:	Worm, Jerri
Email:	jerri.worm@state.co.us
Start Date of On-Site Audit:	10/20/2025
End Date of On-Site Audit:	10/21/2025

FACILITY INFORMATION

Facility name:	Waiawa Correctional Facility
Facility physical address:	94-560 Kamehameha Highway, Waipahu, Hawaii - 96797
Facility mailing address:	

Primary Contact

Name:	Tiresa Harris
Email Address:	tiresa.m.harris@hawaii.gov
Telephone Number:	8086776170

Warden/Jail Administrator/Sheriff/Director

Name:	Sean Ornellas
Email Address:	sean.k.ornellas@hawaii.gov
Telephone Number:	(8080 677-6128

Facility PREA Compliance Manager

Name:	Tiresa Harris
Email Address:	tiresa.m.harris@hawaii.gov
Telephone Number:	

Facility Health Service Administrator On-site

Name:	TA Natasha Iriarte
Email Address:	Natasha.a.iriarte@hawaii.gov
Telephone Number:	(808) 677-6160

Facility Characteristics

Designed facility capacity:	334
Current population of facility:	130
Average daily population for the past 12 months:	140
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys

Age range of population:	25-72
Facility security levels/inmate custody levels:	minimum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	91
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	56
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	105

AGENCY INFORMATION	
Name of agency:	Hawaii Department of Corrections and Rehabilitation
Governing authority or parent agency (if applicable):	
Physical Address:	1177 Alakea Street, Honolulu, Hawaii - 96813
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	Tommy Johnson
Email Address:	tommy.johnson@hawaii.gov
Telephone Number:	808-587-1339

Agency-Wide PREA Coordinator Information			
Name:		Email Address:	
	Cheyenne Evans		cheyenne.l.evans@hawaii.gov

Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

0	
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Number of standards met:

45	
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Number of standards not met:

0	
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POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-10-20
2. End date of the onsite portion of the audit:	2025-10-21

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Sex Abuse Treatment Center at Kapiolani Medical Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	334
15. Average daily population for the past 12 months:	140
16. Number of inmate/resident/detainee housing units:	5
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	157
25. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	14
26. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	28
27. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	4
28. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
29. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
30. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1

31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	91
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	105

<p>38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>56</p>
<p>39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No text provided.</p>
<h2>INTERVIEWS</h2>	
<h3>Inmate/Resident/Detainee Interviews</h3>	
<h4>Random Inmate/Resident/Detainee Interviews</h4>	
<p>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>10</p>
<p>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The auditor reviewed the roster on the first day of the audit and ensured at least one inmate from each housing unit was interviewed.</p>
<p>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>11</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>4</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>3</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>3</p>

<p>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility did not have anyone identified as being deaf or hard of hearing. During the site review and interviews no one who was deaf or hard of hearing was identified.</p>
<p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility did not have anyone identified as being limited English proficient. During the site review and interviews no one who was limited English proficient was identified.</p>

<p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility did not have anyone identified as being transgender. During the site review and interviews no one who was transgender was identified.</p>
<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility has no reports of sexual abuse or harassment in the previous 12 months. During interviews no inmates or staff stated they had made or received any reports in the past 12 months.</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility has no reports of sexual abuse or harassment in the previous 12 months. During interviews no inmates or staff stated they had made or received any reports in the past 12 months, either occurring at the facility or in the community.</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>WCF does not have a segregation unit as well as the facility has no reports of sexual abuse or harassment in the previous 12 months.</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>13</p>
<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>21</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>65. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>66. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

67. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input type="checkbox"/> Other
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input checked="" type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
70. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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Documentation Sampling

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

<p>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	The facility had no reports of sexual abuse or sexual harassment during the audit period.

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
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Inmate-on-inmate sexual abuse investigation files

<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>

89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?

<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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Staff-on-inmate sexual abuse investigation files

<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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Sexual Harassment Investigation Files Selected for Review

<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The facility had no reports or sexual abuse or sexual harassment during the audit period.</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>

Inmate-on-inmate sexual harassment investigation files

<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

Yes

No

Non-certified Support Staff

103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

Yes

No

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

1

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

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

Identify your state/territory or county government employer by name:

Colorado Department of Corrections

Was this audit conducted as part of a consortium or circular auditing arrangement?

Yes

No

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The auditor triangulated relevant documentation, interviews, and available evidence to determine compliance with this standard. Reviewing policies, Offender, and Inmate are used interchangeably and for purposes of this report, the auditor will refer to an incarcerated person as "Offender." On January 1, 2024, the Department of Public Safety (DCR) was re-designated as the Department of Corrections and Rehabilitation (DCR).</p> <p>Documentation reviewed:</p> <ul style="list-style-type: none">• Waiawa Correctional Facility Pre-Audit Questionnaire (WCF PAQ)• Department of Corrections and Rehabilitation, Department Administration Policy and Procedures, Prison Rape Elimination Act (PREA)• ADM.08.08, dated November 15, 2021. For this audit report, this policy will be referred to as ADM.08.08.• Agency PREA Coordinator position description

- Agency Organizational Chart
- WCF Org Chart

Interviews Conducted:

- PREA Coordinator
- PREA Compliance Manager

Reasoning and analysis:

115.11(a):

- ADM.08.08:
 - ADM.08.08 is the agency's written policy that outlines the Department of Corrections and Rehabilitation (DCR) approach to ensure compliance with the Prison Rape Elimination Act (PREA) and it mandates zero tolerance towards all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment as well as sanctions for staff and offenders.
 - It states:
 - "The policy's rationale is DCR has a proactive approach to preventing, detecting, and responding to sexual abuse and sexual harassment, while an offender is under the legal and physical custody of DCR, inclusive of requiring compliance with PREA at privately contracted facilities or community correctional centers. The PREA Standards do not create a legal cause of action. The PREA Standards are guidelines or practices developed to prevent, reduce, eliminate, and investigate sexual abuse and/or sexual harassment; and to provide treatment to victims and prosecute violators, who commit sexual abuse and/or sexual harassment against an offender.
 - This policy is applicable to all DCR staff, contractors, and volunteers, who have contact with offenders, detainees, or residents. This policy applies to all prisons, jails, lockups, private contracted facilities, and community correctional centers under the direct custody and control of DCR. "

115.11(b):

- The PREA Coordinator position description states that this position develops and implements policy and procedures through subordinate staff for the purposes of sentence computation, litigation coordinator, information requests, administrative rule making, and administrative tort claims. They also oversee services and procedures for the correctional division and law

enforcement division in those subject areas and that the develop and implement policy and procedures for PREA.

- The agency organizational chart shows:
 - The organization chart shows that the litigation coordinator office reports to the Office of the Director of DCR.
- The agency PREA Coordinator stated:
 - She feels she has enough time to manage all of her PREA related responsibilities, in addition she oversees litigation, public information and policies for the agency. She oversees 8 facilities, 4 jails and 4 prisons in the state. She reports directly to the director and has the ability to speak directly with all divisions directors as needed.

115.11(c):

- The WCF org chart shows that the PREA Compliance Manager is in the Security Section and the PAQ states that they report to the Warden, Chief of Security and PREA Coordinator.
- ADM.08.08 states:
 - “Each facility shall have a designated Facility PREA Compliance Manager with sufficient time and authority to coordinate the facility’s efforts to comply with the PREA Standards, which may be part of their other related duties. The Department PREA Coordinator will monitor the relevant PREA duties of the Facility PREA Compliance Managers in conjunction with the Warden or Sheriff..”
- Interview with the PREA Compliance manager:
 - The PREA Compliance Manager (PCM) stated that she has to manage her time to cover her PREA related responsibilities.

The auditor finds the agency/facility in full compliance with PREA Provision §115.11 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.12 Contracting with other entities for the confinement of inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

- DCR contract with CoreCivic, Saguaro Correctional Facility, Eloy Arizona.
- Memorandum AG Letter Out of State Facilities, dated September 10, 2024
- Saguaro Correctional Facility Final PREA audit report
- Agency public website

Interviews Conducted:

- Agency Contract Administrator

Findings:

115.12(a):

- The WCF PAQ reported that the agency has contracts for confinement with 1 agency.
- ADM.08.08 states:
 - “DCR mandates that any new contracts or contract renewals with private agencies or other entities for the confinement of DCR’s offenders shall include language that the private entity is required to adopt and comply with PREA, specifically the finalized PREA Standards.”
 - The private entity shall be subject to DCR monitoring/audits as part of its contract with DCR to ensure compliance with the PREA Standards. (115.12 a/b)
 - The private entity is responsible with complying with the audit requirements of the PREA Standards and any cost associated with audits as required by 115.401 to 115.404.
- The one active contract with CoreCivic was reviewed and verified it contains a section regarding PREA compliance. It states:
 - “The Provider shall be in full compliance with the Prison Rape Elimination Act (PREA).”
- The auditor reviewed DCR’s website and there is a link to the private prison’s PREA audits and the most recent audit report (dated 06/26/2024) shows full compliance.

115.12(b):

- The WCF PAQ reported that all contracts require the agency to monitor the contractor’s compliance with PREA.
- Interview with the agency contract administrator:
 - He stated that they currently have contracts for confinement with one facility out of state. He travels to it four times a year and ensures they receive and pass their national PREA audits. He uses auditing forms to ensure the contract is followed. If any PREA related incidents are reported they the facility reports them to him as well as the HDCR PREA Coordinator.

The auditor finds the agency/facility in full compliance with PREA Provision §115.12 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.13 Supervision and monitoring	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed: <ul style="list-style-type: none">• WCF PAQ• DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024• Facility Staffing Plans• Housing and program area log books (on-site)
	Interviews Conducted: <ul style="list-style-type: none">• WCF Warden• PREA Compliance Manager• PREA Coordinator• Intermediate or higher-level staff
	Site review Observations
	Findings: <p>115.13(a):</p> <ul style="list-style-type: none">• The WCF PAQ reports that since the last PREA audit, the average daily number of inmates is 140. They further report that the average daily number of inmates on which the staffing plan is predicated is 334.• ADM.08.08 states:<ul style="list-style-type: none">◦ “The Department PREA Coordinator in conjunction with the Institutions Division Administrator (IDA) shall ensure that each facility develops, documents, and makes its best efforts to comply on a regular basis with a written staffing plan that provides for adequate levels of staffing, and where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, each facility shall take into consideration :

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacy;
- Any findings of inadequacy from federal investigative agencies;
- Any findings of inadequacy from internal or external oversight bodies;
- All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);
- The composition of the inmate population;
- The number and placement of supervisory staff;
- Institution programs occurring on a particular shift;
- Any applicable State or local laws, regulations, or standards;
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- Any other relevant factors."

- The WCF staffing plan:
 - The 2023 WCF staffing plan was reviewed and this auditor verified they contain all requirements of the standard including Generally accepted detention and correctional practices; Any judicial findings of inadequacy; Any findings of inadequacy from Federal investigative agencies; Any findings of inadequacy from internal and external oversight bodies; All components of the facility's physical plant (including "blind spots" or areas where staff or inmates may be isolated); The composition of the inmate population; The number and placement of supervisory staff; Institution programs occurring on a particular shift; Any applicable State or local laws, regulations, or standards; The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and Any other relevant factors.
- Interview with the Warden:
 - The Warden verified that WCF has a staffing plan and that it includes all the information required in the PREA standards. He verified that WCF does not have any findings of inadequacy. He stated WCF currently has no camera system but that they continue to ask for them when the budget allows. To check for compliance with the staffing plan he stated that they hire above the minimum number of staff and if they fall below for any reason both himself and the Chief of Security would be notified.
- Interview with the PREA Compliance Manager:
 - The PREA Compliance Manager verified WCF has a staffing plan and that all required elements in this standard are reviewed.
- Site review observations:
 - During the site review the audit team was able to observe all areas of the facility. Correctional staff were seen in every living unit as well as throughout the other areas of the facility. WCF has no cameras but they have been continuously requested.

115.13(b):

- ADM.08.08 states:
 - “In circumstances where the facility’s written staffing plan is not complied with, the facility shall document by utilizing the PREA Mandated Reporting Form (DCR 8317) and justify all deviations from the plan. This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.”
- The WCF PAQ reports that there were no deviations from the staffing plan in the past year.
- Interview with the Warden:
 - In the interview with the Warden he stated that they would document any instances where they deviate from the staffing plan.

115.13(c):

- ADM.08.08 states:
 - “The Warden shall review the facility’s written staffing plan annually in the month of July, at the start of the fiscal year, and submit his/her assessment to the Department PREA Coordinator via email, fax, or mail by the end of the month. The Department PREA Coordinator will schedule a formal meeting to review the written staffing plan which shall consist of assessing, determining, and documenting whether adjustments are needed to:
 - The written staffing plan established pursuant to paragraph (1) of this section;
 - The facility’s deployment of video monitoring systems and other monitoring technologies; and
 - The resources the facility has available to ensure adherence to the staffing plan.”
- The WCF staffing plan does state that it is reviewed in consultation with the PREA Coordinator and in her interview she verified that she is involved in annual staffing plan meetings conducted prior to the legislative sessions. The auditor would recommend that the names of the staff involved in the staffing plan meeting be added to it as well notated or signed by the PREA Coordinator when she reviews it.

115.13(d):

- ADM.08.08 states:
 - “The Warden shall ensure that lieutenants, captains, and correctional supervisors conduct and document unannounced walk-throughs on all watches to aid in identifying and deterring staff sexual abuse and sexual harassment. This shall be documented in the housing unit Informer/Logbook and/or in the Supervisor’s watch summary.
 - DCR staff is prohibited from alerting other staff members of the above-

unannounced walk-throughs by superiors, unless such an announcement is related to the legitimate operational functions of the facility.”

- Interviews with intermediate or higher staff:
 - Intermediate or higher staff were interviewed and reported that they do conduct unannounced rounds in all areas including the housing units. They document them in a log book in each module. To stop staff from alerting others they conduct the rounds at different times and take varying routes.
- Site review observations:
 - During the site review the audit team randomly checked log books in multiple modules and several areas and they showed staff conducting rounds on all shifts.

The auditor finds the agency/facility in full compliance with PREA Provision §115.13 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • WCF PAQ <p>Site Review Observations</p> <p>Findings:</p> <p>115.14(a, b, c):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that they do not house youthful inmates. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “According to HRS §706-667, the Court has the authority to commit a young adult defendant, who is sentenced to a term of imprisonment exceeding a period of thirty (30) days to DCR. The statute defines a young adult defendant as a person convicted of a crime, who at the

time of the offense is eighteen (18) and less than twenty-two (22) years of age and who has not been previously convicted of a felony as an adult or adjudicated as a juvenile for an offense that would have constituted a felony had the young adult defendant been an adult. The definition of an adult is a person eighteen (18) years or older (HRS §571-23).

- PREA's definition of a youthful offender differs from the HRS §706-667 definition. PREA defines a youthful offender as any person under the age of eighteen (18), who is under adult court supervision, incarcerated, or detained in a prison or jail. A youthful detainee is any person under the age of eighteen (18), who is under adult court supervision and detained in a lockup.
- DCR does not normally manage youthful offenders/detainees as defined by PREA; however, it is important to note that specialized requirements would apply to the housing of a youthful offender/detainee in a DCR facility.
- According to HRS §571-22, the Family Court may relinquish its jurisdiction over a youthful offender and transfer the case to a Court of criminal jurisdiction for prosecution of the juvenile offender as an adult.
- If DCR does receive a youthful offender as defined by PREA, described in paragraph (2) of this section, then the youthful offender shall not be housed in a housing unit in which the youthful offender shall have sight, sound, and physical contact with any adult offender using a shared dayroom or other common space, shower area, or sleeping quarters. The facility staff shall document by utilizing the PREA Mandated Reporting Form (DCR 8317) any non-compliance with the above requirement. This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
- DCR staff shall maintain sight, sound, and physical separation between the youthful offenders and adult offenders in areas outside of the housing units, or shall provide direct staff supervision, when youthful offenders and adult offenders have sight, sound, and physical contact. (115.14 b) The facility staff shall document by utilizing the PREA Mandated Reporting Form (DCR 8317) any non-compliance with the above requirement. This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
- DCR shall document the exigent circumstances for each instance in which a youthful offender's access to large-muscle exercise, legally required educational services, other programs, and work opportunities are denied in order to separate them from adult offenders by utilizing the PREA Mandated Reporting Form (DCR 8317). This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days. (115.14 c)

- DCR shall make its best efforts to avoid placing youthful offenders in isolation to comply with this provision.”
- Site review observations:
 - During the site review no inmates that appeared to be under 18 were observed. Staff were informally asked about youthful inmates during the site review and all stated that they do not house them at WCF. The inmate roster for the first day of the audit did not show anyone under the age of 18.
- No interviews with youthful inmates or staff who supervise youthful inmates were able to be completed as WCF does not hold youthful inmates.

The auditor finds the agency/facility in full compliance with PREA Provision §115.14 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.15 Limits to cross-gender viewing and searches	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • Training on Cross-gender strip search <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Random Staff • Random Inmates <p>Site Review Observations</p> <p>Findings:</p> <p>115.15(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that they do not conduct cross-gender strip or visual body cavity searches of inmates and that there have been no incidents of cross-gender strip or cross-gender visual body cavity searches of inmates in the past 12 months. • ADM.08.08 states:

- “DCR staff shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening), except in exigent circumstances, or when performed by medical practitioners.
- An incident of cross-gender strip searches and cross-gender visual body cavity searches shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317). This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.”
- No non-medical staff involved in cross-gender strip or visual searches were able to be interviewed as WCF does not conduct cross-gender strip or visual searches.
- Site review observations:
 - During the site review the areas where strip searches are conducted were viewed by the audit team and it was verified that they provide enough privacy that cross-gender viewing is obstructed.

115.15(b):

- ADM.08.08 states:
- “DCR staff shall not conduct cross-gender pat-down searches of female offenders, absent exigent circumstances.
 - All cross-gender pat-down searches of female offenders shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317). This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
 - Facilities shall not restrict female offenders’ access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.
 - Facilities shall not restrict female offenders’ access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.”

This provision does not apply to this facility as they do not house female inmates.

115.15(c):

- ADM.08.08 states:
 - “All cross-gender pat-down searches of female offenders shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317). This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.”
- No cross-gender strip searches had been conducted in the past 12 months so no logs or other documentation were able to be reviewed.

115.15(d):

- ADM.08.08 states:
 - “An offender shall be allowed to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances, or when such viewing is incidental to routine cell checks. (115.15 d) The facility staff shall document any exigent circumstances by utilizing the PREA Mandated Reporting Form (DCR 8317) any exigent incident. This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
 - Staff of the opposite gender are required to “knock and announce” their presence when entering an offender housing unit and ensure that this notice is logged in the Informer or Logbook. For example, a male staff member entering a female housing unit must “knock and announce” his presence via an intercom or a verbal broadcast by stating “male in the housing unit, ensure that you are properly dressed.”
- Site review observations:
 - During the site review the audit team saw staff in all living units. The audit team included females and staff announced them when they entered all living units. Most security staff were male but there were some females who stated they always announce before entering the dorm areas where offenders may be undressed.
 - WCF has no cameras so none were reviewed.
 - Shower and toilet areas were viewed in each unit. No privacy concerns were noted and the shower/restroom areas had enough privacy for the residents to change clothes, use the toilet and shower without being viewed by opposite gender staff.
- Inmate interview questionnaire:
 - A total of 21 inmates were asked if female staff announce when they enter the living units and 19 stated that yes female staff announce when they enter the dorms, 2 stated they were not sure. All also stated that they have enough privacy to use the toilet, shower and change clothing.
- Random staff interviews:
 - A total of 13 random staff from all shifts and various posts throughout the facility were interviewed and all stated that female staff are announced when they enter the dorms and make sure all the inmates are fully dressed. All staff stated that inmates are able to dress, shower and toilet without being viewed by opposite gender staff.

115.15(e):

- Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing this section.

	<p>115.15(f):</p> <ul style="list-style-type: none"> • Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing this section. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.15 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.16	<p>Inmates with disabilities and inmates who are limited English proficient</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • LEP Services contract • Staff training curricula related to Limited English Offenders and Translation services • PREA posters • Offender Informational Guide (brochure) • DCR Limited English Proficiency (LEP) Plan <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head • Inmates (with disabilities or who are limited English proficient) • Random Staff <p>Site Review Observations</p> <p>Findings:</p> <p>115.16(a-b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Disabled offenders and offenders with limited English proficiency shall be provided with equal opportunity to participate in or benefit from all
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aspects of DCR's efforts to prevent, detect, and respond to sexual abuse and sexual harassment."

- A contract with an interpretation service was reviewed that has been in place for over 10 years and an email from the agency confirming the services are still available.
- Training slides for agency wide PREA training were reviewed that shows the elements of this standard are included.
- Written materials, including the PREA poster and brochure were reviewed that were written in clear, easy to understand language.
- Interview with the Agency Head:
 - He stated that the agency has a civil rights compliance office and has certified staff interpreters that include American Sign Language. He said the most common language spoken outside of English is Japanese and Tagalog.
- Interviews with inmates with disabilities or who are limited English proficient:
 - A total of ten inmates who were disabled or limited English proficient were interviewed. Of those ten, three were low vision, four had physical disabilities and three had a mental health disability. Nine stated they were given information on sexual abuse and harassment they were able to understand.

115.16(c):

- The WCF PAQ reported they have not used an inmate to interpret during this audit period.
- ADM.08.08 states:
 - "The use of offender interpreters, or other types of offender assistance is prohibited, except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise an offenders' safety.
 - In the limited circumstances where offender interpreters, or other types of offender assistance are utilized, it shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317). This form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
 - The Civil Rights Compliance Office (CRCO) has designated procedures for the use of authorized interpreters. Effective August 20, 2013, Pacific Interpreters at 1-866-XXX-XXXX shall be contacted for interpreters. If further assistance is required on this matter, contact the Department PREA Coordinator or the Facility PREA Compliance Manager."
- Site review observations:
 - Staff were informally interviewed during the site review and stated they were aware they could not use other inmates to interpret for anything PREA related.
- Interviews of random staff:

	<ul style="list-style-type: none"> Thirteen random staff were interviewed and asked when an inmate would be allowed to interpret for another inmate. All of the staff interviewed stated they would not use another inmate to interpret for anything PREA related. They all knew they were supposed to get a translator or they knew to contact a supervisor for guidance. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.16 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> WCF PAQ DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 Policy ADM.03.05: Live Scan and Record of Arrest and Prosecution Background, dated October 8, 2021 Certification letter from the Hawaii Department of the Attorney General, dated January 8, 2020 DCR 8318, Personnel PREA Form Criminal History Record Clearance form (Lautenberg Amendment) <p>Interviews Conducted:</p> <ul style="list-style-type: none"> Administrative (Human Resources) Staff
	<p>Site Review Observations</p> <p>Findings:</p> <p>115.17(a-b):</p> <ul style="list-style-type: none"> ADM.08.08 states: <ul style="list-style-type: none"> “DCR prohibits the hiring or promoting of anyone, who may have contact with offenders, and shall not utilize the services of any contractor or volunteer, who may have contact with offenders, if that person: <ul style="list-style-type: none"> Has engaged in sexual abuse in a prison, jail, lockup,

community confinement facility, juvenile facility, or other institution owned, operated, or managed by the state as defined by 42 U.S.C. 1997, for example the Hawaii State Hospital or other state skilled nursing, intermediate, long-term care, custodial, or residential care 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;
- Has been civilly or administratively adjudicated to have engaged in the activity described in the paragraphs above.
- Has been the subject of substantiated allegations of sexual abuse or sexual harassment or resigned during a pending investigation of alleged sexual abuse or sexual harassment.
- There are less stringent requirements for volunteers, who are utilized as peer mentors, but this requires a case-by-case assessment and review with the Department PREA Coordinator.”

- PSD 8318 is a form used that includes this standards required questions regarding PREA and sexual abuse and sexual harassment and is completed by all applicants.
- Interview with human resources staff:
 - In the interview with human resources staff she stated that yes, the facility does consider prior incidents of sexual harassment when determining whether to hire or promote anyone, or to enlist the services on any contractor who may have contact with inmates. She stated that they are all given the application packet which includes the PSD 8318 and it is required to be completed then submitted. She also checks with the agency PREA Coordinator to check if there are any pending complaints/investigations involving the applicant.

115.17(c-d):

- The WCF PAQ reports that 10 criminal background checks have been performed in the past 12 months for persons hired who may have contact with inmates.
- ADM.08.08 states:
 - “DCR shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to utilize the services of any contractor or volunteer, who may have contact with offenders.
 - Before new employees, contractors, or volunteers, who may have contact with offenders, are hired, DCR shall:
 - Perform a criminal background record checks, consistent with federal, state, and local law; and
 - Utilize a “best effort” to contact all prior institutional employers for information on substantiated allegations of

sexual abuse or any resignation, due to a pending investigation of an allegation of sexual abuse."

- Interview with human resources staff:
 - HR staff stated that the facility performs criminal record checks for all newly hired employees as well as those being considered for promotions. She stated that once the paperwork is submitted then each applicant is fingerprinted. They then receive a report from the fingerprint check as well as they run a state report and check NCIC for each.

115.17(e):

- ADM.08.08 states:
 - "DCR's Personnel's Office is responsible for ensuring compliance with the five-year cycle of background checks for current employees.
 - It is noted that DCR does conduct annual Lautenberg type of background checks on those employment positions that are required to carry a firearm."
- ADM 03.05 addresses the agency background check process for prospective staff and current staff members. It includes information on the use of Live Scan and the Record of Arrest and Prosecution Background Service (RAP Back).
- Interview with human resources staff:
 - HR staff stated that the RAP Back system is used, which includes continuing and on-going checks based on fingerprints, so if a staff member is arrested or fingerprinted HDCR is notified.

115.17(f-g):

- ADM.08.08 states:
 - "DCR shall ask all applicants and employees, who may have direct contact with offenders, about previous misconduct(s) described in paragraph (1) of this section either on (a) a written application, (b) during an interview for hire, (c) a promotional interview, or (d) if applicable, during any interview or written self-evaluation conducted as part of reviews of current employees. This requirement is documented by utilizing the PREA Applicant Questionnaire (DCR 8318), during the application process for prospective employees, employee promotions, or employee transfers.
 - All DCR staff has an affirmative duty to immediately disclose any such misconduct covered by sections .1 and .2 by immediately reporting the incident through their chain of command.
 - Any DCR staff, who materially omits reporting such misconduct or provides materially false information shall be subject to discipline based on the just and proper cause standard, up to and including discharge. See Department of Human Resources Policy 702.003."

- Interview with human resources staff:
 - HR staff stated that staff do have a continuous duty to disclose any misconduct.

115.17(h):

- ADM.08.08 states:
 - “DCR 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 conducting a background check on the employee, preferably with a signed consent to release information form.
 - If the Department Personnel Officer receives such a request from an institutional employer, the request will be forwarded to the Department PREA Coordinator for review and drafting of a response.”

The auditor finds the agency/facility in full compliance with PREA Provision §115.17 based upon analysis of all available evidence including the documentation provided and interviews conducted.

115.18 Upgrades to facilities and technologies	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head • Warden <p>Findings:</p> <p>115.18(a):</p> <ul style="list-style-type: none"> • The WCF PAQ indicates that the agency/facility has not acquired a new facility or made a substantial expansion or modification since the last PREA audit.

- ADM.08.08 states:
 - “When designing or acquiring any new facility, and in planning any substantial expansion or modification of existing facilities, DCR shall consider the impact that the design, acquisition, expansion, or modification will have on DCR’s ability to protect offenders from sexual abuse.”
- Interview with Agency Head:
 - She stated that facility and agency leadership work together when designing, acquiring or planning any substantial modifications to facilities. They will review the staffing plan, any reported incidents, compare to similar facilities and evaluate sound correctional practices.
- Interview with the Warden:
 - The Warden confirmed that WCF has not had any substantial expansions or modifications since the last PREA audit.

115.18(b):

- ADM.08.08 states:
 - “When installing or updating a video monitoring system, electronic surveillance system, close circuit television (CCTV), or other monitoring technology, DCR shall consider how such technology may enhance the agency’s ability to protect offenders from sexual abuse.”
- Interview with the Agency Head:
 - He stated that they continuously improve their monitoring technology and look at site lines and determine which areas need cameras to monitor staff and inmate movement, also previous incidents and investigations would be taken into consideration.
- Interview with the Warden:
 - He stated that when updating monitoring technology they would consider how it would enhance inmates’ protection from sexual abuse including covering blind spots.

The auditor finds the agency/facility in full compliance with PREA Provision §115.18 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.21 Evidence protocol and forensic medical examinations	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024
- National Protocol for Sexual Assault Medical Forensics Examinations, Second Edition
- Sex Abuse Treatment Center (SATC) - Kapiolani Medical Center for Women and Children (contract 24-HSA-01)

Interviews Conducted:

- Random Staff
- SAFE/SANE Staff
- PREA Compliance Manager

Findings:

115.21(a-b):

- The WCF PAQ reported:
 - The agency/facility is responsible for conducting administrative sexual abuse investigation but they are not responsible for conducting criminal sexual abuse investigations and that they are completed by the Honolulu Police Department.
- ADM.08.08 states:
 - “DCR is responsible for conducting all administrative sexual abuse investigations. All criminal sexual abuse investigations shall be referred to the county LE agency (Honolulu Police Department, Hawaii Police Department, Maui Police Department, and Kauai Police Department).
 - If County LE declines to investigate the initial report related to a criminal case, then a referral shall be made to the State of Hawaii, Department of the Attorney General (AG) to investigate the criminal case. DCR staff are required to cooperate with the county LE’s or AG’s criminal investigation. DCR staff shall be afforded protections based on Garrity Warnings in the administrative investigation if the facts constitute a criminal offense or warrant a criminal investigation.
 - DCR utilizes departmental evidence protocols that maximize the potential for obtaining usable physical evidence for administrative proceedings and preserves the crime scene for criminal investigations and prosecution.
 - The Health Care Division staff shall determine, based on evidentiary or medical needs, whether a victim of sexual abuse will be transported for a forensic medical examination at the Sex Abuse Treatment Center (“SATC”) or at a hospital emergency unit. This shall be at no financial cost to the victim. (115.21 c/d) In facilities without twenty-four (24) hour medical, then the on-call physician shall be contacted.”
- Interviews with random staff:

- Thirteen random staff were asked about the agency's protocol for obtaining usable physical evidence. The majority stated that they would separate the victim and suspect, secure the scene and notify through their supervisor. Several staff specifically knew that they were to request the victim not take any actions to destroy evidence and instruct the suspect not to. Most knew the PREA Compliance Manager or watch commander conducted the administrative investigations.

115.21(b):

- The WCF PAQ reported that WCF does not hold youthful inmates and that their protocols were adapted from the "A National Protocol for Sexual Assault Forensic Examinations."

115.21(c):

- The WCF PAQ reported:
 - All inmates who experience sexual abuse are offered access to forensic medical examination at an outside facility, Kapi'olani Medical Center for Women and Children Sex Abuse Treatment Center. The PAQ further reported there were no forensic medical exams conducted in the past 12 months.
- ADM.08.08 states:
 - "The Health Care Division staff shall determine, based on evidentiary or medical needs, whether a victim of sexual abuse will be transported for a forensic medical examination at the Sex Abuse Treatment Center ("SATC") or at a hospital emergency unit. This shall be at no financial cost to the victim. (115.21 c/d) In facilities without twenty-four (24) hour medical, then the on-call physician shall be contacted.
 - The use of Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) are utilized at the SATC. On the outer islands, a comparable program is utilized.
 - If a SAFE or SANE is not available, the examination may be performed by other qualified medical practitioners. The SATC and its contracted representative on the outer islands have indicated that victim advocates are available during an examination."
- Interview with SANE Coordinator:
 - The Executive Director for the Kapi'olani Medical Center for Women and Children Sex Abuse Treatment Center was interviewed and verified they offer forensic examinations conducted by a SAFE provider at their location. She stated that the providers are on-call 24/7.

115.21(d):

- The WCF PAQ states:
 - The facility makes a victim advocate from a rape crisis center available from Kapi'olani Medical Center for Women and Children Sex Abuse Treatment Center and that per the contract with SATC they provide advocate services 24/7 so a staff member would not be used.
- The contract with SATC was reviewed and the auditor verified that they provide crisis response services including in-person services 24/7/365.
- Interview with the PREA Compliance Manager:
 - The PCM stated that they have an agreement with the SATC to provide advocacy services.

Interviews with Inmates who reported sexual abuse were unable to be conducted as there were no reports of sexual abuse at WCF in the past 12 months.
- Interview with the rape crisis center:
 - The Executive Director for the Kapi'olani Medical Center for Women and Children Sex Abuse Treatment Center was interviewed regarding advocacy services as well since they are provided by her staff. She stated they provide a 24 hour hotline for all prisons, including WCF. They offer immediate help and support and also respond to SATC for support during forensic medical examinations.

115.21(e):

- ADM.08.08 states:
 - “At the request and approval of the victim, a victim advocate from the SATC, or SATC contracted provider on the outer islands shall be provided to support the victim through the forensic medical examination process and the investigatory interview. The purpose of a victim advocate is to provide emotional support, crisis intervention, information, and referrals.
- Interview with the PREA Compliance Manager:
 - She stated that the contracts with the advocates is handled by the PREA Coordinator.

115.21(f):

- ADM.08.08 states:
 - DCR shall ensure that internal investigations comply with the above requirements and external investigative entities (County LE) have procedures in place to comply with the above requirement.

115.21(g): Auditor is not required to audit this provision.

115.21(h): WCF uses advocates through SATC only.

	The auditor finds the agency/facility in full compliance with PREA Provision §115.21 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Investigative Staff • Agency head <p>Findings:</p> <p>115.22(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. They further reported that in the past 12 months 0 allegations of sexual abuse and sexual harassment were received at WCF. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR ensures that an internal administrative investigation and an external referral for criminal investigation are completed for all allegations of sexual abuse and sexual harassment with the limitation that any criminal referral for sexual harassment must meet a criminal standard. ◦ All external referrals for a criminal investigation shall be processed through a county LE agency, such as Honolulu Police Department, Maui Police Department, Kauai Police Department, and Hawaii Police Department. ◦ DCR staff are required to complete the Department of Corrections and Rehabilitation PREA Response Incident Checklist form, DCR 8313, for all allegations of sexual abuse and sexual harassment. If a facility has developed a Facility PREA Coordinated Response Incident Checklist, then it must incorporate at a minimum all variables included on the

Department's PREA Response Incident Checklist (DCR 8313). This form and initial reports shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days."

- Interview with the Agency Head:
 - He stated that the agency does ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment. He further stated that any priority one report, which includes sexual contact, would include separating the involved parties, notifying the sheriff and the PREA officer at the facility.

115.22(b-c):

- ADM.08.08 requires:
 - "If an allegation of sexual abuse or sexual harassment involves potentially criminal behavior, then the allegation shall be immediately referred to a county LE agency.
 - DCR Internal Affairs Office ("IA") shall be immediately notified of any allegation of sexual abuse or potentially serious incident of sexual harassment. The administrative investigation may be completed by IA or at the facility level pursuant to an order of the Director or his/her designee.
 - DCR publishes the Departmental policy, ADM.08.08, Prison Rape Elimination Act on the official department website at www.hawaii.gov/DCR."
- The agency website: (<https://dcr.hawaii.gov/policies-and-procedures/pp-prea/>) was reviewed and verified that ADM.08.08 is available for the public to view.
- Interview with facility investigator:
 - The administrative investigator was interviewed and she stated that agency policy requires that allegations of sexual abuse or sexual harassment be referred for investigation.

115.22(d): Auditor is not required to audit this provision.

115.22(e): Auditor is not required to audit this provision.

The auditor finds the agency/facility in full compliance with PREA Provision §115.22 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.31 Employee training

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024
- Staff training curricula, dated February 12, 2024

Interviews Conducted:

- Random Sample of Staff

Site Review Observations

Findings:

115.31(a-b)

- ADM.08.08 states:
 - “DCR provides a comprehensive training module for all staff emphasizing DCR’s zero-tolerance policy and the importance of preventing sexual abuse/sexual assault and sexual harassment toward offenders. DCR educates staff about the serious impact of offender sexual victimization within a correctional setting.
 - All DCR staff who may have contact with offenders are trained on:
 - DCR’s zero-tolerance policy for offender sexual abuse and sexual harassment;
 - How to fulfill their responsibility under DCR’s sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
 - Offenders’ rights to be free from sexual abuse and sexual harassment;
 - The right of offenders and staff to be free from retaliation for reporting sexual abuse and sexual harassment;
 - The dynamics of sexual abuse and sexual harassment in confinement;
 - The common reactions of victims of sexual abuse and sexual harassment;
 - How to detect and respond to signs of threatened and actual sexual abuse;
 - How to avoid inappropriate relationships with offenders based on staff over familiarity and fraternization;
 - How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders; and
 - How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
 - DCR’s staff training is tailored to address all genders of

offenders in a correctional facility; therefore, additional training is not required when a staff member transfers to a different gender facility.”

- The training curriculum was reviewed and verified it contains all the standards requirements.
- Interviews with random staff:
 - Thirteen random staff were interviewed and most stated they received training on PREA either at the training academy or at the facility in the past 2 years with the majority stating they received it at the facility in the last few months.
- Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing the following section: 115.31(a)(9).

115.31(c):

- ADM.08.08 states:
 - “The Warden, DCR Administrators, or Sheriff shall ensure that all current staff shall have received PREA training. The Warden or Sheriff shall notify the Department’s Training and Staff Development Office (TSD) and the PREA Coordinator of any individual who requires training.”
 - The Warden, Sheriff, or TSD staff shall provide each staff member with a refresher PREA training every two (2) years to ensure that the staff member is aware of DCR’s PREA policy related to offender sexual abuse, offender sexual harassment, and any retaliation for reporting or assisting in an investigation.
 - In years when the staff member does not receive the refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies through the DCR website, handouts, posters, memorandums etc.”

115.31(d):

- ADM.08.08 states:
 - “DCR training acknowledgement forms and sign-in sheets are verification that the staff member received and understood the PREA training. The acknowledgement form shall include the following statement: “By signing, I acknowledge receipt of PREA training and understand the materials presented.”

The auditor finds the agency/facility in full compliance with PREA Provision §115.31 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • Volunteer and Contractor Training curricula, dated January 23, 2024
	<p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Volunteers • Contractors
	<p>Findings:</p>
	<p>115.32(a-b):</p>
	<ul style="list-style-type: none"> • The WCF PAQ reports that 160 volunteers and contractors, who may have contact with inmates, have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ "All volunteers and contractors, who have contact with offenders shall be trained on PREA, DCR's policy, and their responsibilities regarding the prevention, detection, and how to respond to a report of offender sexual abuse and sexual harassment." ◦ The level and type of training provided to volunteers and contractors shall be tailored to the level of contact and services provided to offenders. ◦ All current volunteers and contractors have been notified of DCR's zero-tolerance policy regarding offender sexual abuse and sexual harassment, as well as how to report such incidents." • Interviews with volunteers/contractors: <ul style="list-style-type: none"> ◦ Three volunteers/contract staff were interviewed by the audit team and all three stated they have received training regarding PREA and their responsibilities. They also stated that they have been notified of the agency's zero-tolerance policy on sexual abuse and sexual harassment and how to report such incidents.
	<p>115.32(c):</p>
	<ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ "DCR maintains documentation confirming that volunteers and contractors received an appropriate level of training and that they

	<p>understood the information provided. A copy shall be maintained with the DCR Volunteer Coordinator and is available to the DCR PREA Coordinator upon request.</p> <ul style="list-style-type: none"> ◦ The staff member responsible for training volunteers, or the staff member who contracts on behalf of DCR or the facility, shall ensure that all volunteers and contractors are trained on their responsibilities regarding offender sexual abuse and sexual harassment. ” <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.32 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Informational Guide for Offenders (brochure) • PREA Posters <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Intake Staff • Random inmates • Disabled/LEP Inmates <p>Site Review Observations</p> <p>Findings:</p> <p>115.33(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that 116/116 (100%) of inmates admitted in the past 12 months were given PREA education at intake. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Offenders shall receive verbal and written information at the time of admission by Intake Service Center (ISC) staff, and upon transfer to a prison by the facility’s Intake staff about DCR’s zero-tolerance policy,

and how to report incidents or suspected incidents of sexual abuse or sexual harassment.”

- Interview with intake staff:
 - The auditors walked through the education process with staff. They stated that WCF shows the PREA video to all newly arriving inmates during the intake process on the day of arrival. He stated that after the video all new arrivals meet with him for orientation and he has bullet points he follows which includes information on PREA including who they can report an incident to. He further stated all new arrivals sign a form that they have been educated on PREA and also receive a pamphlet.
- Interviews with random inmates:
 - Of the 21 random inmates interviewed, 20 stated they received educational information about the zero-tolerance policy and how to report upon arrival at WCF, 1 stated they did not see the video.

115.33(b):

- The WCF PAQ reported that 116/116 (100%) of those inmates admitted during the past 12 months (whose length of stay was for at least 30 days) received comprehensive education.
- ADM.08.08 states:
 - “Within thirty (30) days of intake, the DCR facility shall provide comprehensive PREA education via video (JDI video) or classroom instruction to offenders that addresses:
 - Prevention and intervention;
 - Self-protection;
 - Reporting sexual abuse, sexual harassment, and protection from retaliation, including information on the options to report the incident to a designated staff member other than an immediate point-of-contact line officer;
 - Treatment and counseling;
 - DCR’s zero-tolerance for sexual abuse/sexual assault, sexual harassment, and retaliation.”
- Interviews with random inmates:
 - The majority of the inmates stated they received the information the day they arrived at WCF or within the first week after arrival.

115.33(c):

- The WCF PAQ reported that all inmates had been educated within 30 days of intake during the audit period.
- ADM.08.08 states:
 - “Effective August 2013, all current offenders should have received information on PREA. DCR requires that offenders who are transferred from one facility to another be re-educated only to the extent that the

policies and procedures of the new facility differ from those of the previous facility. ”

115.33(d):

- ADM.08.08 states:
 - “It is DCR’s policy to make appropriate provisions, as necessary, for offenders with limited English proficiency through the CRCO’s identification of authorized interpreters.
 - Accommodations for offenders with disabilities (including offenders who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) and offenders with low literacy levels shall be made at the facility level.
 - ISC and Intake staff shall document by utilizing the PREA Mandated Reporting Form (DCR 8317), if an inmate requires accommodation and this form shall be forwarded to the Facility PREA Manager and Department PREA Coordinator via email, fax, or mail within three (3) days.”
- Interviews with inmates who are disabled or limited English proficient:
 - A total of ten offenders were interviewed using the disabled and limited English proficient inmates’ protocol. Nine of the ten offenders stated they did receive information about sexual abuse and sexual harassment in a manner they were able to understand.

115.33(e):

- ADM.08.08 states:
 - “Each facility shall maintain electronic or written documentation of an offender’s participation in the educational session (video or classroom). This documentation shall be forwarded to the Facility PREA Manager and the Department PREA Coordinator via email, fax, or mail within three (3) days.”

115.33(f):

- ADM.08.08 states:
 - “DCR shall ensure that key information on DCR’s PREA policies are continuously and readily available or visible through posters, handouts, offender handbooks, and resources in the offender library.”
- Site review observations:
 - During the site review the audit team found PREA posters in every living unit. Most were located near the phones in the common area. When inmates were informally interviewed they stated the PREA posters are visible.

	The auditor finds the agency/facility in full compliance with PREA Provision §115.33 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Investigations training slides, dated April 6, 2020 • PSD Training Curriculum on Sexual Abuse Investigations • National Institute of Corrections (NIC) - Specialized Training, Investigating Sexual Abuse in a Confinement Setting • Wicklander-Zulawski and Associates, Inc Training Curriculum-Effects of Trauma on Behavior and Memory • Training certificate of Completion for NIC training (15 staff) <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Investigative staff <p>Findings:</p> <p>115.34(a-c):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “IA, or facilities, if authorized by the Director, shall conduct the internal administrative investigation for any allegations of sexual abuse. In addition to the general training provided to all employees under §18.0 of this policy, DCR investigators shall receive training on conducting sexual abuse investigations in confinement settings. ◦ DCR’s specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda (not applicable) and Garrity warnings, preserving sexual abuse evidence for collection in confinement settings, and an understanding of the criteria and evidence required to substantiate a case in an administrative proceeding or for a referral by a county LE agency for criminal prosecution.

- DCR shall maintain documentation substantiating that investigators have completed the required training and it shall be documented on the staff member's training record with TSD. A copy shall also be provided to the Department PREA Coordinator via email, fax, or mail within three (3) days.
- The Department PREA Coordinator will be responsible for the classroom requirement of sexual abuse investigations training. IA investigators or Facility Investigators may comply with this provision through the webinars for Specialized PREA Investigations Training offered at the PRC website and the National Institute of Corrections (NIC) website.”
- The agency investigation training curriculums, including the NIC on-line training, were reviewed and verified that they cover investigations in confinement settings, interview techniques for interviewing sexual abuse victims, proper use of Garrity and Miranda warnings (the agency does not conduct criminal investigations so they would never use Miranda), evidence collection in confinement settings and the definitions of unfounded, substantiated and unsubstantiated.
- Certificates of completion for the NIC PREA: Investigating Sexual Abuse in a Confinement Setting were received for the fifteen investigators verifying they successfully completed the training.
- Interview with investigative staff:
 - An investigator was interviewed and she stated that they have received the NIC on-line training specific to conducting sexual abuse investigations in confinement settings and that it included techniques for interviewing victims.

115.34(d): Auditor is not required to audit this provision.

The auditor finds the agency/facility in full compliance with PREA Provision §115.34 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.35 Specialized training: Medical and mental health care	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed: <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

- NIC Training certificates for PREA: Medical Health Care for Sexual Assault Victims in a Confinement Setting (2 staff)

Interviews Conducted:

- Medical staff

Findings:

115.35(a):

- ADM.08.08 states:
 - “All full-time and part-time medical and mental health practitioners, who work regularly in DCR facilities should be trained in:
 - How to detect and assess signs of sexual abuse and sexual harassment;
 - How to preserve physical evidence of sexual abuse;
 - How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
 - How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.
 - DCR medical and mental health staff are not responsible for conducting forensic examinations.”
- The WCF PAQ reported that 5/5 (100%) medical and mental health care staff who work regularly at the facility have received the training.
- Interviews with medical staff:
 - Two medical staff were interviewed and all stated they have received training regarding sexual abuse and sexual harassment and that it covered all required topics including how to detect and assess signs of sexual abuse and sexual harassment and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

115.35(b): This provision is not applicable as forensic medical examinations would be conducted at an outside facility and not by agency staff.

115.35(c-d):

- ADM.08.08 states:
 - “DCR shall maintain documentation substantiating that medical and mental health practitioners have completed the required training and it shall be documented on the staff member’s training record with TSD. A copy shall also be provided to the Department PREA Coordinator via email, fax, or mail within three (3) days.
 - Medical and mental health practitioners shall receive the training mandated for employees under §18.0 or §19.0 of this policy, based on the practitioner’s status. Medical and mental health practitioners may

	<p>comply with this provision through the webinars for Specialized PREA Training for Medical and Mental Health Practitioners offered at the PRC website and the National Institute of Corrections (NIC) website.”</p> <ul style="list-style-type: none"> • The auditor received training certificates for NIC’s PREA:Medical Health Care for Sexual Assault Victims in a Confinement Setting for 2 staff. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.35 based upon analysis of all available evidence including the documentation provided and interviews conducted.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Risk Screening tool DOC 8314 and Instructions • Risk Screening Documentation <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Staff responsible for risk screening • Random Inmates • PREA Coordinator • PREA Compliance Manager <p>Site Review Observations</p> <p>Findings:</p> <p>115.41(a-e):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “The ISC is required to screen offenders at the intake screening process, which occurs upon admission to a facility, by utilizing the PREA Screening Tool (DCR 8314) and the accompanying Instructions for the PREA Screening Tool. ◦ The intake screening by ISC shall occur within seventy-two (72) hours of intake/arrival.

- The facility staff shall review the offender’s risk of sexual abuse victimization (vulnerability factors) or sexual abusiveness (predatory factors) toward other offenders, by reviewing the “Intake” PREA Screening Tool.
- The facility shall conduct an affirmative reassessment of an offender’s risk of victimization or abusiveness within thirty (30) days of intake screening, based upon any additional relevant information is received about the offender’s victimization or abusiveness, subsequent to the intake screening, by utilizing the PREA Screening Tool (DCR 8314) and consult various sources (e.g., mental health, disciplinary history, allegations of relevant threats or victimization) including interviewing the inmate to determine whether any previously unknown triggering event or information has become available and to document such review.
- If no additional relevant information is received by the facility when reassessing the intake screening, then check the appropriate box on the intake screening tool processed within seventy-two (72) hours of admission. (115.41 f)
- ISC and facility staff shall utilize the PREA Screening Tool (DCR 8314) to conduct PREA risk assessments. (115.41 c)
- The PREA Screening Tool (DCR 8314) evaluates an offender’s vulnerability factors and predatory factors. The PREA Screening Tool considers the following criteria to assess offenders for risk of sexual victimization:
 - Whether the offender has a mental, physical, or developmental disability;
 - The age of the offender;
 - The physical build of the offender;
 - Whether the offender has previously been incarcerated;
 - Whether the offender’s criminal history is exclusively nonviolent;
 - Whether the offender has prior convictions for sex offenses against an adult or child (see predatory factors);
 - Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
 - Whether the offender has previously experienced sexual victimization, in a correctional and/or non-correctional setting, within the last ten (10) years;
 - The offender’s own perception of vulnerability (oral feedback); and
 - Whether the offender is detained solely for civil immigration purposes, which normally does not occur at DCR facilities.
- The PREA Screening Tool considers prior predatory acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, if known to the facility, in assessing offenders for risk of being sexually abusive.”

- The WCF PAQ reports that 114/114 (100%) of inmates entering the facility within the past 12 months whose length of stay was for 72 hours or more were screened for risk or sexual victimization and risk of sexual abusiveness.
- The PREA Screening tool was reviewed and verified it contains all required questions from this standard.
- Interviews with staff who perform screening for risk of victimization and abusiveness:
 - A staff member who completes the PREA screening was interviewed and she stated that she screens all offenders within 72 hours of their arrival at WCF, normally the day after they arrive. She went over some of the questions she asks including if they have ever been abused, either inside or outside of a facility, if they have any physical or developmental disabilities, any mental health concerns, any prior sexually related convictions and also reviews their institutional file.
- Interviews with random inmates:
 - Of the 21 offenders interviewed, 18 stated they were asked questions about PREA when they arrived at WCF, 3 stated they were not or could not remember.
- Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing the following section: 115.41(d)(7).

115.41(f):

- ADM.08.08 states:
 - "The facility shall conduct an affirmative reassessment of an offender's risk of victimization or abusiveness within thirty (30) days of intake screening, based upon any additional relevant information is received about the offender's victimization or abusiveness, subsequent to the intake screening, by utilizing the PREA Screening Tool (DCR 8314) and consult various sources (e.g., mental health, disciplinary history, allegations of relevant threats or victimization) including interviewing the inmate to determine whether any previously unknown triggering event or information has become available and to document such review. "
- The WCF PAQ reported that 114/114 (100%) inmates who entered the facility in the last 12 months whose length of stay was 30 days or more were reassessed for their risk of sexual victimization and of being sexually abusive.
- Interviews with staff who perform screening for risk of victimization and abusiveness:
 - The staff interviewed stated inmates are screened again within 30 days, she normally waited until they have been at WCF at least 3 weeks. She stated she has a tracker with the due date and has each offender sign a form after the assessment.

115.41(g):

- ADM.08.08 states:
 - “The offender’s risk of victimization or abusiveness shall be reassessed; when a referral, request, incident of sexual abuse, or receipt of additional information which may impact the offender’s risk level by utilizing the PREA Screening Tool (DCR 8314).”
- Interviews with staff who perform screening for risk of victimization and abusiveness:
 - The staff interviewed stated they would complete assessments due to referrals, request, incidents of sexual abuse or receipt of additional information.

115.41(h):

- ADM.08.08 states:
 - “An offender shall not be disciplined for refusing to answer, or for not disclosing complete information related to, the questions asked pursuant to §24 of this policy. .”
- Interviews with staff who perform screening for risk of victimization and abusiveness:
 - Staff stated that inmates would not be disciplined for refusing to answer any of the questions during the PREA screening.

115.41(i):

- ADM.08.08 states:
 - “The information on the PREA Screening Tool (DCR 8314) is subject to confidentiality requirements; therefore, professional, and ethical rules shall be enforced to avoid any negative impact to the offender. The information should not be exploited to the detriment of the offender. ”
- Interview with the PREA Coordinator:
 - She stated that the agency has outlined who has access to an inmate’s risk assessment. She stated that it is all in their computer system and when someone signs in there is a pop-up confirming that they are accessing it for a business purpose and that they have the ability to query who has accessed the assessments.
- Interview with the PREA Compliance Manager:
 - She stated that access is only for those who need to know.
- Interviews with staff who perform screening for risk of victimization and abusiveness:
 - Staff indicated that access is based on each persons log in and that they can only access areas needed.

The auditor finds the agency/facility in full compliance with PREA Provision §115.41 based upon analysis of all available evidence including the documentation provided and interviews conducted.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Risk Screening tool DOC 8314 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • PREA Compliance Manager • PREA Coordinator • Staff Responsible for Risk Screening <p>Findings:</p> <p>115.42(a-b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR shall use the information from the risk assessment screening for housing designations, work line, program assignment, or scheduling to keep separated those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. ◦ DCR shall use the risk screening tool information to make an individualized assessment about how to ensure the safety of each individual offender.” • The DRR 8314 Instructions for PREA Screening Tool includes how to use their designation and victim, potential victim, sexual predator or potential sexual predator for housing determinations. • Interview with the PREA Compliance Manager: <ul style="list-style-type: none"> ◦ She stated that during the intake process if staff have any concerns about housing she is contacted as the PCM and that the scores are also used for work and program assignments. • Interview with staff who perform screening for risk of victimization and abusiveness: <ul style="list-style-type: none"> ◦ The staff who complete screening and assessments stated the information is used for housing. <p>115.42(c-g):</p> <ul style="list-style-type: none"> • Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing the

	<p>following sections: 115.42(c) through (g).</p> <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.42 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Warden <p>Site Review Observations</p> <p>Findings:</p> <p>115.43(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that zero inmates at risk of sexual victimization were held in involuntary segregated housing in the past 12 months. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR discourages the placement of offenders in involuntary administrative segregated housing solely because of their high risk of sexual victimization status, unless an assessment of all available alternatives has been made and it is concluded that there is no available alternative for separating the victim from a likely abuser. This shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317), which shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days. ◦ If the DCR facility is unable to conduct the above assessment immediately, the facility may hold the offender in involuntary administrative segregated housing for a period of less than twenty-four (24) hours pending the completion of the mandated assessment.” • Interview with the Warden:

- He stated that WCF has temporary holding cells that an inmate may be placed in until they are able to be transferred to other facilities.

115.43(b):

- ADM.08.08 states:
 - “Offenders placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible, as dictated by the facility’s schedule and operational needs.
 - If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document this by utilizing the PREA Mandated Reporting Form (DCR 8317). This shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days. The documentation shall include:
 - The programs, privileges, education, or work opportunities that have been limited;
 - The duration of the limitation; and
 - The reasons for such limitations.”
- Staff who supervise inmates in segregated housing were unable to be interviewed as WCF does not have segregated housing.
- There were no inmates who reported sexual abuse, or were at risk of sexual victimization, that were placed in segregated housing at WCF so no interview was able to be conducted for this targeted category.

115.43(c):

- The WCF PAQ reported that in the past 12 months no inmates at risk of sexual victimization were assigned to involuntary segregated housing for longer than 30 days.
- ADM.08.08 states:
 - “If a DCR facility assigns an offender at risk of sexual victimization to involuntary administrative segregated housing as an alternative means of separation from the likely abuser, then such an assignment should not normally exceed a period of thirty (30) days.”
- Interview with the Warden:
 - He stated that victims could be separated in an area like the infirmary until a facility transfer could be done.

115.43(d):

- ADM.08.08 states:
 - “If an involuntary administrative segregated housing assignment is made pursuant to paragraph (1) of this section, the facility shall document this by utilizing the PREA Mandated Reporting Form (DCR

8317), which shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days:

- The basis for the facility's concern for the offender's safety; and
- The reason why no alternative means of separation can be arranged."
- The WCF PAQ reports that no inmates were placed in involuntary segregated housing so no file reviews were able to be done.

115.43(e):

- ADM.08.08 states:
 - "If the placement in involuntary administrative segregated housing exceeds the initial thirty (30) days, the facility shall conduct follow-up reviews as dictated by COR.11.01: Administrative Segregation and Disciplinary Segregation, but no less than every thirty (30) days to assess the offender's continued separation from the general population.
 - This shall be documented by utilizing the PREA Mandated Reporting Form (DCR 8317), which shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days."

The auditor finds the agency/facility in full compliance with PREA Provision §115.43 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none">• WCF PAQ• DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024• Offender Informational Guide (brochure)• PREA Posters <p>Interviews Conducted:</p> <ul style="list-style-type: none">• Random Staff

- Random Inmates
- PREA Compliance Manager

Site Review Observations

Findings:

115.51(a):

- ADM.08.08 states:
 - “DCR provides multiple internal and external ways for offenders to privately report sexual abuse and sexual harassment; retaliation by other offenders or staff for reporting sexual abuse and sexual harassment; and staff neglect or violation of responsibilities that may have contributed to such incidents.
 - Offenders may report non-consensual sexual acts, abusive sexual contacts, staff sexual misconduct, or staff sexual harassment to any DCR employee, contract employee, volunteer, or other external reporting avenues described in PREA information given to the inmate by using available methods of communication, including but not limited to verbal or written reports.
 - Offenders, staff, and others may report incidents of sexual abuse, sexual harassment, and retaliation for reporting by:
 - Contacting the Ombudsman at 808-587-0770 or at 465 South King Street 4th Floor, Honolulu, HI 96813; a Legislative or Political Representative (at their office address), or the Department of the Attorney General 808-586-1500 or at 425 Queen Street, Honolulu, HI 9613;
 - Contacting the Sex Abuse Treatment Center at 808-524-7273 or at 55 Merchant Street, 22nd Floor, Honolulu, HI 96813;
 - Contacting the Department PREA Coordinator at 808-587-1328 or at 1177 Alakea St., Honolulu, HI 96813;
 - Contacting the Director or the relevant Deputy Director at 808-587-1288 or at 1177 Alakea St., Honolulu, HI 96813; Internal Affairs at 1177 Alakea St., Honolulu, HI 96813; or the Facility Warden or Investigator at the relevant facility;
 - Notifying a family member, who can initiate a telephone call or a letter to the Key Staff identified above; or
 - Filing an Emergency Offender Grievance Complaint.
 - Contacting the relevant County LE agency.
 - Offenders may use the departmental GTL speed dial phone system to contact the relevant office/agencies described above free of charge and may do so confidentially and anonymously.”
 - The PREA posters and brochure were reviewed and they both contain reporting information for offenders including multiple options as to how they can make a report.

- Site review observations:
 - During the site review the audit team verified the PREA poster was posted in all living units and it includes multiple reporting options and was consistent throughout the facility. The posters were easily viewable by all inmates in the day room near the phones.
- The auditor tested the reporting line and the reports went to the PREA Coordinator who verified she received them.
- Interviews with random staff:
 - Thirteen random staff were interviewed and all staff were able to communicate at least one method for inmates to privately report sexual abuse or sexual harassment and most knew multiple options including telling staff, calling the hotline or writing a kite.
- Interviews with random inmates:
 - Twenty-one inmates were interviewed and the majority were able to list at least one way to report with the majority listing multiple options including telling staff, calling the hotline or reporting to family.

115.51(b):

- ADM.08.08 states:
 - “DCR provides notification to offenders on how to report abuse or harassment to a public entity, private entity, or an external agency, who can receive and immediately forward offender reports of sexual abuse and sexual harassment to agency officials, such as the Department PREA Coordinator and may allow the offender to remain anonymous upon request.
 - If an offender is detained solely for civil immigration purposes, the offender shall be provided information on how to contact the relevant consular officials and relevant Department of Homeland Security officials. It should be noted that DCR does not normally house offenders solely for civil immigration purposes.”
- The offender PREA poster states that they can report to a family member or friend, tell staff, contact SATC or the PREA ombudsman.
- Interview with the PREA Compliance Manager (PCM):
 - She stated that WCF provides multiple options for reporting including via letter calling the PREA Ombudsman or PREA hotline.
- Interviews with random inmates:
 - Of the twenty-one inmates asked if they can report anonymously the majority stated yes that they could call one of the PREA lines.

115.51(c):

- ADM.08.08 states:
 - “DCR mandates that staff accept reports of sexual abuse, sexual harassment, or retaliation made verbally, in writing, anonymously, and from third parties. Staff shall immediately document all verbal reports

of sexual abuse, sexual harassment, or retaliation by immediately notifying superiors through the chain of command.”

- Interviews of random staff:
 - Of the twelve random staff asked about what they would do if they received a verbal report of sexual abuse or sexual harassment all stated they would notify their supervisor or chain of command and write a report by the end of their shift.
- Interviews with random inmates:
 - Of the 21 offenders asked if they can make reports of sexual abuse or sexual harassment either in person or in writing and if someone else can make the report for them with the majority stating that family or friends could report for them.

115.51(d):

- ADM.08.08 states:
 - “A staff member may privately report incidents of offender sexual abuse, offender sexual harassment, or retaliation as indicated in paragraph (4) of this section.”
- Interviews with random staff:
 - Thirteen random staff were asked how staff can privately report and the majority stated they could report to their chain of command.

The auditor finds the agency/facility in full compliance with PREA Provision §115.51 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • DCR Policy COR.12.03 Inmate Grievance Program, dated August 10, 2024 <p>Findings:</p> <p>115.52(a):</p>

- ADM.08.08 Administrative complaints states:
 - "DCR's policy COR.12.03: Inmate Grievance Program outlines the administrative procedures available to offenders for reporting incidents of sexual abuse, sexual harassment, or retaliation."
- DCR Policy COR 12.03 Inmate Grievance Program outlines the administrative procedures available to offenders for reporting incidents of sexual abuse, sexual harassment, or retaliation.

115.52(b):

- ADM.08.08 states:
 - "This section is an addendum to COR.12.03: Inmate Grievance Program as it relates to PREA incidents. PREA mandates that there shall be "no time limits or deadlines" for filing a grievance that is reporting an alleged incident of sexual abuse.
 - DCR shall not restrict the processing of an offender grievance regarding an allegation of sexual abuse.
 - The filing period set forth in COR.12.03: Inmate Grievance Program is still applicable to any portion of the grievance that does not allege an incident of sexual abuse. The offender must still comply with appeal filing requirements as set forth in COR.12.03.
 - DCR shall not require an offender to utilize the informal grievance process for grievances alleging incidents of sexual abuse.
 - The statutory or legal provisions germane to the statute of limitations are applicable to any civil action in a court proceeding".

115.52(c):

- ADM.08.08 states:
 - "An offender may submit an offender grievance alleging sexual abuse without submitting it to the staff member, who is the subject of the complaint. This grievance shall not be referred to the staff member, who is the subject of the grievance complaint."

115.52(d):

- The WCF PAQ reported that they have received no grievances in the past 12 months that alleged sexual abuse.
- ADM.08.08 states:
 - "DCR's grievance policy and timelines may differ from the PREA requirement that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within ninety (90) days

of the filing of the grievance.

- Computation of the PREA 90-day time period does not include time consumed by offenders in preparing any administrative appeal.
- DCR may claim an extension of time to respond, of up to seventy (70) days if the normal time period for response is insufficient to make an appropriate decision. DCR shall notify the offender in writing of any such extension and provide a date by which a decision will be made.
- At any level of the administrative process, including the final level, if the offender does not receive a response within the time allotted for reply, including any properly noticed extension, the offender may consider the absence of a response to be a denial at that level.”
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.

115.52(e):

- ADM.08.08 states:
 - “DCR permits third parties, including fellow offenders, staff members, family members, attorneys, and outside advocates, to assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse and they may file such requests on behalf of offenders.
 - If a third-party files such a request on behalf of an offender, 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.
 - If the offender declines to have the request processed on his or her behalf, DCR shall document the offender’s decision on the PREA Mandated Reporting Form (DCR 8317), which shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.

115.52(f):

- The WCF PAQ reported that zero emergency grievances alleging substantial risk of imminent sexual abuse.
- ADM.08.08 states:
 - “DCR’s current Grievance policy establishes procedures for filing an emergency grievance alleging that an offender is subject to a substantial risk of imminent sexual abuse. This section is intended to supplement the Grievance policy by requiring that:

- An initial response is provided within forty-eight (48) hours.
- After receiving an emergency grievance alleging an offender is subject to a substantial risk of imminent sexual abuse, the DCR staff member shall immediately forward the grievance or any portion thereof that alleges the substantial risk of imminent sexual abuse to a level of review where immediate corrective action may be initiated.
- DCR shall issue a final agency decision within five (5) calendar days. The decision shall include a determination as to whether the offender is at substantial risk of imminent sexual abuse, and it shall describe the action taken in response to the emergency grievance.

115.52(g):

- ADM.08.08 states:
 - “DCR may initiate a misconduct violation against an offender for filing a grievance or reporting related to alleged sexual abuse or sexual harassment, when DCR demonstrates that the offender filed the grievance or report in bad faith.”
- The WCF PAQ reports that no grievances alleging sexual abuse resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith in the past 12 months.

The auditor finds the agency/facility in full compliance with PREA Provision §115.52 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.53 Inmate access to outside confidential support services	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation and other evidence reviewed: <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Informational Guide for Offenders (brochure) • PREA Posters • Sexual Abuse Treatment Center (SATC) contract, including supplemental for out of state facilities

Interviews Conducted:

- Random Inmates
- Advocate with the local rape crisis center

Site Review Observations

Findings:

115.53(a-c):

- ADM.08.08 states:
 - “DCR shall provide offenders with access to outside victim advocates for emotional support services related to sexual abuse by doing the following:
 - Providing offenders with the mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations. DCR’s service provider is the SATC and its relevant outer island providers.
 - Providing offenders with mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
 - Enabling reasonable communication between offenders and these organizations in as confidential a manner as possible, while balancing the good government and orderly running of the facility.
 - DCR medical and mental health staff shall inform offenders, prior to giving them access to outside support services, of the extent to which such communications will be monitored.
 - DCR shall inform offenders of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law.
 - DCR maintains agreements with community service providers through SATC based on the awarded contract by the Executive Branch. The SATC provides offenders with emotional support services related to sexual abuse. DCR maintains a copy of the grant awarded to SATC to document the relationship and obligations for SATC and DCR.”
- The PREA poster for inmates was reviewed and it has contact information (address and phone number) for the local advocacy center, the Sex Abuse Treatment Center.
- The MOU with SATC was reviewed and it shows they will provide safe and confidential emotional support, accompaniment, crisis intervention, information and referral to victims of sexual abuse in confinement as required by the PREA.

- Site review observations:
 - PREA signage was seen in the living units that included information on how to call or write the local rape crisis center, SATC. The information was current, accurate and consistent throughout the facility. The audit team tested the phones in multiple units and we were able to call the rape crisis line) without entering a PIN and the call was answered.
- Interview with an advocate from the rape crisis center:
 - The auditor interviewed the SATC Executive Director by phone. She stated they are available to provide victim advocacy and emotional support services to inmates in WCF. She verified they have a phone line that is answered and would respond to the Kepi'olani hospital if requested.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.
- Interviews with random inmates:
 - The majority of random inmates interviewed were not aware of outside services available for sexual abuse if needed but when questioned further several did state they did not need these services so they were unaware if they were available or that they thought there was information on the poster about the services.

The auditor finds the agency/facility in full compliance with PREA Provision §115.53 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • Reporting information on the HDCR website <p>Site Review Observations</p> <p>Findings:</p> <p>115.54(a):</p>

- ADM.08.08 states:
 - "DCR provides the public notice via DCR's website of the methods for third-party reports of offender sexual abuse or sexual harassment.
 - DCR publicly distributes information on how to report offender sexual abuse or sexual harassment on behalf of offenders by posting on DCR's website the Departmental PREA Policy, PREA Handout, PREA poster etc."
- The agency website was reviewed and this auditor verified it contains reporting information for community members.
- Site review observations:
 - During the site review the audit team observed PREA posters in various areas around the facility.

The auditor finds the agency/facility in full compliance with PREA Provision §115.54 based upon analysis of all available evidence including the documentation provided and the site review.

115.61 Staff and agency reporting duties	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Random staff • Medical staff • Warden • PREA Coordinator <p>Site Review Observations</p> <p>Findings:</p> <p>115.61(a):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ "DCR requires that all staff immediately report any knowledge,

- suspicion, or information, they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, or a non-DCR facility.
 - DCR requires that all staff immediately report, any knowledge, suspicion, or information, they receive regarding retaliation against offenders or staff, who reported such an incident.
 - DCR requires that all staff immediately report any knowledge, suspicion, or information, they receive regarding staff neglect or violation of responsibilities that may have contributed to a PREA incident or retaliation.”
- Interviews with random staff:
 - Thirteen random staff were asked if they are required to report any knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, or other information about sexual abuse or sexual harassment all answered yes, that they would report to their supervisor or chain of command.

115.61(b):

- ADM.08.08 states:
 - “DCR prohibits staff from revealing any information related to a sexual abuse report to anyone other than and to the extent necessary to manage treatment, investigation, and other security decisions, inclusive of reporting to the designated supervisors or officials and designated State or local service agencies.”
- Interviews with random staff:
 - Thirteen random staff were asked if they are required to report any knowledge, suspicion, or information regarding sexual abuse, sexual harassment, retaliation, or other information about sexual abuse or sexual harassment all answered yes. They further stated that they knew to preserve the crime scene (if applicable), separate the victim and suspect and notify their chain of command.

115.61(c):

- ADM.08.08 states:
 - “Unless otherwise precluded by federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraphs (1-3) of this section and to inform offenders of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services.”
- Interviews with medical staff:
 - Two medical staff were interviewed and they both stated that the limitations of confidentiality are disclosed when they are admitted. They all also confirmed that they are required to report any knowledge, suspicion or information regarding an incident of sexual

abuse or sexual harassment.

115.61(d):

- ADM.08.08 states:
 - “If the alleged victim is under the age of eighteen (18) or considered a vulnerable adult under a state or local “vulnerable person’s statute,” DCR shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.”
- As WCF does not house offenders under the age of 18, this section would only apply to vulnerable adults. Since local law enforcement conducts all criminal investigations, they would be responsible for completing any necessary mandatory reports. Hawaii Revised Statutes Chapter 346, Part X, relating to Adult Protective Services defines a vulnerable adult as “a person 18 years of age or older who, because of mental, developmental or physical impairment is unable to:
 - Communicate or make responsible decisions to manage one’s own care or resources; or
 - Carry out or arrange for essential activities of daily living; or
 - Protect oneself from abuse.”
- Interview with the Warden:
 - The Warden stated that they would not have anyone under 18 at WCF.
- Interview with the PREA Coordinator:
 - The PREA Coordinator stated that WCF does not house any under 18.

115.61(e):

- ADM.08.08 states:
 - “HRS §346, Part X: Adult Protective Services, defines a “vulnerable adult” as a person eighteen (18) years of age or older who because of mental, developmental, or physical impairment, is unable to:
 - Communicate or make responsible decisions to manage his/her own resources;
 - Carry out or arrange for essential activities of daily living; or
 - Protect oneself from abuse, including physical abuse, psychological abuse, sexual abuse, financial exploitation, caregiver neglect, or self-neglect.
 - HRS §346, Part X: Adult Protective Services, mandates that personnel employed in health care, social services, LE, and financial assistance are required to report suspected abuse or neglect of a vulnerable adult. The law mandates reporting when there is reason to believe abuse has occurred or the vulnerable adult is in danger of abuse, if immediate action is not taken.
 - DCR shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, through the chain of command and a copy shall be forwarded to the Department

	<p>PREA Coordinator via email, fax, or mail within three (3) days.”</p> <ul style="list-style-type: none"> • Interview with the Warden: <ul style="list-style-type: none"> ◦ The Warden confirmed that all incidents are reported to facility investigators as well as the PREA Compliance Manager and the Honolulu Police Department. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.61 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head • Warden • Random staff <p>Findings:</p> <p>115.62(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that they have had no incidents in the past 12 months when the agency or facility determined that an inmate was subject to substantial risk of imminent sexual abuse. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “When a Facility or DCR staff learns that an offender is subject to a substantial risk of imminent sexual abuse, the party shall take immediate action to protect the offender. ◦ Immediate action means to assess appropriate protective measures without unreasonable delay. The procedures are dictated by this policy and other relevant departmental policies.” • Interview with the agency head <ul style="list-style-type: none"> ◦ The agency head stated that they would notify the Warden of the

	<p>facility and ensure an investigation is conducted including private interviews of any involved parties and then determine if any movement is needed.</p> <ul style="list-style-type: none"> • Interview with the Warden: <ul style="list-style-type: none"> ◦ The Warden stated that at WCF they rarely have incidents where someone is at imminent risk of sexual abuse but would follow the PREA response plan if one was to occur. • Interviews with random staff: <ul style="list-style-type: none"> ◦ Thirteen random staff were interviewed and stated they would take the claim seriously and notify their supervisor/chain of command, separate anyone involved and ensure the victim is safe. They also stated this would be done as fast as possible/immediately. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.62 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head • Warden <p>Findings:</p> <p>115.63(a-b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Upon receiving an allegation that an offender was sexually abused while confined at a non-DCR facility, the receiving Facility Head or Warden shall immediately notify the non-DCR facility Head or Warden of the PREA sexual abuse allegation. The Facility Head or Warden shall include the department PREA Coordinator in the formal notification to

the non-DCR facility, via "Carbon Copy" for email notifications, or by emailing the fax transmittal to the head of the facility for fax notifications.

- Upon receiving an allegation that an offender was sexually abused while confined at a DCR facility, the receiving Facility Head or Warden shall immediately notify the alleged DCR Facility Head or Warden of the PREA sexual abuse allegation. The Facility Head or Warden at the receiving facility shall include the department PREA Coordinator in the formal notification to the DCR facility, via "Carbon Copy" for email notifications, or by emailing the fax transmittal to the head of the facility for fax notifications.

The Facility Head or Warden shall provide such notifications as soon as possible, but no later than seventy-two (72) hours after receiving the allegation."

- The WCF PAQ reports that in the past 12 months, they have had no allegations received that an inmate was abused while confined at another facility.

115.63(c-d):

- ADM.08.08 states:
 - "The Facility Head or Warden shall document that he/she has provided such notifications within seventy-two (72) hours of receiving the allegation.
 - The Facility Head or Warden shall require and advise the non-DCR or DCR facility that the allegation must be investigated as required by the PREA Standards."
- The WCF PAQ reports that they have received no allegations of sexual abuse from other facilities in the past 12 months so no files were able to be reviewed.
- Interview with the Agency Head:
 - He stated that when another agency, or facility, is notified of an allegation they ensure an investigation is completed and local law enforcement is contacted.
- Interview with the Warden:
 - The Warden stated that they would send the information to the Chief to initiate the investigation process and would work with the PREA Coordinator to see if the case was already investigated. He confirmed that they had not received any in the past 12 months.

The auditor finds the agency/facility in full compliance with PREA Provision §115.63 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024
	<p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Security staff first responders • Random staff
	<p>Site Review Observations</p>
	<p>Findings:</p>
	<p>115.64(a):</p>
	<ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR’s first responder policy for allegations of sexual abuse dictates that, upon learning of an allegation that an offender was sexually abused, the first staff member, who ideally would be a security staff member, to respond to the reported incident is required to: <ul style="list-style-type: none"> ■ Separate the alleged victim and abuser; ■ Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence by county LE and IA; ■ If the abuse occurred within a time period (DCR Health Care Division’s standard is seventy-two (72) hours) that still allows for the collection of physical evidence, then 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 ■ If the abuse occurred within a time period (DCR Health Care Division’s standard is seventy-two (72) hours) that still allows for the collection of physical evidence, then staff shall 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.” • The WCF PAQ reported that in the past 12 months no allegations of sexual abuse were received. • Interviews with staff first responders:

- Two staff were interviewed who were first responders and both stated they would separate the involved parties, control access to the crime scene, ask the victim and ensure the perpetrator didn't take any actions to destroy evidence and notify their chain of command, including the PREA Compliance Manager.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.

115.64(b):

- ADM.08.08 states:
 - “DCR requires that if the first staff responder is not a security staff member, the staff responder will be required to separate the victim and abuser, if feasible, request that the alleged victim not take any actions that could destroy physical evidence, and then immediately notify security staff. ”
- The WCF PAQ reported that in the past 12 months, the number of times a non-security staff member was the first responder was zero.
- Interviews with random staff:
 - Thirteen random staff from across all shifts were asked what they would do if they were the first person to be alerted that an inmate has been the victim of sexual abuse and they stated they would secure the scene, make sure evidence is not destroyed and notify their chain of command, several staff specifically stated they would request the victim not take any actions to destroy evidence and ensure the perpetrator does not destroy evidence.

The auditor finds the agency/facility in full compliance with PREA Provision §115.64 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.65 Coordinated response	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed: <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

- DCR 8313 PREA Incident Checklist-Updated, dated October 31, 2023
- WCF Coordinated Response Plan

Interviews Conducted:

- Warden

Findings:

115.65(a):

- ADM.08.08 states:
 - “Each DCR facility must develop a facility specific written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.
 - Each facility’s written institutional plan shall incorporate the PREA Incident Checklist (DCR 8313) and other PREA forms. If a facility has developed a Facility PREA Coordinated Response Incident Checklist, then it must incorporate at a minimum all variables included on the Department’s PREA Response Incident Checklist (DCR 8313).
 - Following a PREA incident, a copy of the PREA Incident Checklist (DCR 8313) shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.”
- The WCF coordinated response plan was reviewed and it includes all the standards requirements for staff first responders. It includes actions for first responders to take for incident of sexual abuse. The steps include separating the inmate from the alleged perpetrator, notifying the chain of command, notifying the health care unit, requesting the victim not take any actions to destroy evidence, isolate witnesses and the crime scene and notifying law enforcement.
- Interview with the Warden:
 - He stated that yes, WCF has a coordinated action plan for response to an incident of sexual abuse and that it includes separating the victim and perpetrator and interviewing all involved parties.

The auditor finds the agency/facility in full compliance with PREA Provision §115.65 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.66

Preservation of ability to protect inmates from contact with abusers

Auditor Overall Determination: Meets Standard

Auditor Discussion	
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • United Public Workers/AFSCME Local 646 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head <p>Findings:</p> <p>115.66(a):</p> <ul style="list-style-type: none"> • The WCF PAQ reports that the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreements. • ADM.08.08 states: <ul style="list-style-type: none"> ◦ "DCR or any other governmental entity responsible for collective bargaining on DCR's behalf shall not enter into or renew any collective bargaining agreement (CBA) or other similar agreement that limits DCR's ability to: <ul style="list-style-type: none"> ■ Remove alleged staff sexual abusers from contact with any offender pending the outcome of an investigation; or ■ In a determination of whether and to what extent discipline is warranted. ◦ Nothing in the PREA standards shall restrict the entering into or renewal of a CBA or similar agreement related to: <ul style="list-style-type: none"> ■ The conduct of the disciplinary process as long as said CBA or similar agreement is not inconsistent with PREA standard §115.72 (evidentiary standard) and §115.76 (disciplinary action); or ■ Whether a non-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated." • Interview with the Agency Head: <ul style="list-style-type: none"> ◦ He stated that HDCR has two unions and the contracts are renewed in four year increments. He confirmed that they are able to issue no contact orders when needed and place staff in a no inmate contact position such as a tower or perimeter and can also place staff on leave if needed. <p>115.66(b): Auditor is not required to audit this provision.</p>

	The auditor finds the agency/facility in full compliance with PREA Provision §115.66 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • DCR Mandatory Reporting Form, PSD 8317, dated October 31, 2023 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Agency Head • Designated staff members charged with monitoring retaliation <p>Site Review Observations</p> <p>Findings:</p> <p>115.67(a-b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR’s policy protects all offenders and staff who report sexual abuse or sexual harassment or cooperates with a sexual abuse or sexual harassment investigation, from retaliation by other offenders, staff, or others. The designated Facility PREA Compliance Manager in conjunction with the Warden or the Sheriff is charged with monitoring any issues related to retaliation.” ◦ DCR utilizes multiple protection measures, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offenders or staff; when the individual fears or experiences retaliation for reporting sexual abuse or sexual harassment or for cooperating with a PREA investigation.” • DCR Mandatory Reporting Form, PSD 8317 form includes information on what to monitor for including housing issues/changes, threats to safety/retaliation, any issues with programming and documentation review.

- Interview with the Agency Head:
 - When asked how he protects inmates and staff from retaliation he stated that the agency has zero tolerance for retaliation and workplace violence. If retaliation is reported they would investigate and, if founded, terminate staff and prosecute.
- Interview with the designated staff member charged with retaliation monitoring:
 - The retaliation monitor stated that she educates everyone on the effects of retaliation on the victim and would conduct an investigation if any retaliation is reported. She ensures she communicates with staff, including the Chief of Security, and makes sure the victim is separated from the suspect. She speaks with each victim about every 30 days.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.
- There were no inmates in Segregated housing for risk of sexual victimization/ who allege to have suffered sexual abuse to be interviewed.

115.67(c-d):

- ADM.08.08 states:
 - For a period of not less than ninety (90) days following a report of sexual abuse, the Facility PREA Compliance Manager in conjunction with the Warden and other staff shall monitor the conduct and treatment of offenders or staff, who reported the sexual abuse.
 - During this minimum ninety (90) day period following a report of sexual abuse, the Facility PREA Compliance Manager in conjunction with the Warden and other staff shall monitor offenders, who were reported to have suffered sexual abuse, to see if there are any changes that may suggest possible retaliation by other offenders or staff.
 - If it has been determined that the offender has suffered retaliation, then staff shall initiate proactive measures to promptly remedy any retaliation.
 - The Facility PREA Compliance Manager and the Warden shall:
 - Act promptly to remedy any such retaliation and report their actions through the chain of command.
 - Monitor any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff.
 - Continue such monitoring beyond ninety (90) days if the initial monitoring indicates a continuing need. (115.67 c)
 - In the case of offenders, monitoring by the Facility PREA Compliance Manager shall also include periodic status checks, preferably conducted weekly, at a minimum.”

- The WCF PAQ reported that no incidents of retaliation have occurred in the past 12 months and that they monitor for a minimum of 90 days.
- Interview with the designated staff member charged with retaliation monitoring:
 - The monitor stated she speaks with each victim and checks if they are comfortable in their housing, work and program assignments. She monitors for at least 90 days but would monitor longer if needed.

115.67(e):

- ADM.08.08 states:
 - “If any other individual, who cooperates with an investigation expresses a fear of retaliation, then DCR shall take appropriate measures to protect that individual against retaliation.
 - The facility or DCR staff shall document all incidents of retaliation and the minimum ninety (90) day monitoring requirement described under this section on the PREA Mandated Reporting Form (DCR 8317). A copy of this form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days
 - The obligation of the Facility PREA Compliance Manager, Warden, and/or Sheriff to monitor shall terminate, if the investigation concludes that the allegation is unfounded.”
- Interview with the Agency head:
 - He stated that if needed they can remove someone to PC or move the perpetrator to segregation or look at moving to another facility to keep the victim safe.

115.67(f): Auditor is not required to audit this provision.

The auditor finds the agency/facility in full compliance with PREA Provision §115.67 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.68 Post-allegation protective custody	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed:
	<ul style="list-style-type: none"> • WCF PAQ

- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

Interviews Conducted:

- Warden

Site Review Observations

Findings:

115.68(a):

- ADM.08.08 states:
 - “Any use of involuntary segregated housing to protect an offender post allegation, who is alleged to have suffered sexual abuse, is subject to the requirements of §27.0 of this policy.”
- The WCF PAQ reported that there have been no incidents in the past 12 months where an inmate who alleged to have suffered sexual abuse was held in involuntary segregated housing.
- Interview with the Warden:
 - He stated that WCF has temporary holding cells that an inmate may be placed in until they are able to be transferred to other facilities.
- Staff who supervise inmates in segregated housing were unable to be interviewed as WCF does not have segregated housing.
- There were no inmates who reported sexual abuse, or were at risk of sexual victimization, that were placed in segregated housing at WCF so no interview was able to be conducted for this targeted category.

The auditor finds the agency/facility in full compliance with PREA Provision §115.68 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.71 Criminal and administrative agency investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

Interviews Conducted:

- Investigative staff
- Warden
- PREA Coordinator
- PREA Compliance Manager

Findings:

115.71(a):

- ADM.08.08 states:
 - “When DCR conducts an administrative investigation into an allegation of sexual abuse and/or sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.
 - If sexual abuse is alleged, a DCR IA investigator, who has received specialized training in sexual abuse investigations pursuant to §21.0 of this policy will conduct the administrative investigation, unless the Director has authorized the Facility to conduct the administrative investigation. The Facility Investigator must have received the specialized training in sexual abuse investigations pursuant to §21.0.”
- Interviews with investigative staff:
 - An administrative investigator was interviewed and stated most investigations are immediately initiated to the chain of command, including to the Chief of Security and the agency PREA Coordinator.

115.71(b):

- Interviews with investigative staff:
 - The administrative investigators verified she completed the NIC training for investigations including how to speak with victims and what questions to ask.

115.71(c-g,i):

- ADM.08.08 states:
 - “The county LE agency for each island is delegated with conducting all criminal sex abuse and criminal sexual harassment investigations. The county LE agency is charged with the responsibility to make the required referrals for criminal prosecution, if warranted.
 - DCR IA Investigators shall:
 - 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, unless a delay of an interview of a victim is requested by county LE.

- Review prior complaints and reports of sexual abuse involving the suspected perpetrator.
- When the quality of evidence appears to support criminal prosecution, DCR shall conduct compelled interviews of staff by affording the staff member Garrity Warnings. DCR Investigators should consult with county LE or prosecutors as to whether a compelled interview may be an obstacle for subsequent criminal prosecution.
- The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined merely by the person's status as an offender or staff member. DCR staff does not require an offender, who alleges sexual abuse, to submit to a polygraph examination, computer voice stress analysis (CVSA) or other truth-telling device as a condition for proceeding with the investigation. DCR staff may offer the victim or non-staff witnesses the option to participate in this type of technological process (polygraph, CVSA or other truth-telling device).
- Administrative investigations shall include:
 - An effort to determine whether staff actions or failures to act contributed to the abuse; and
 - Written reports shall include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative findings of facts.”

- Interviews with investigative staff:
 - The investigator stated the first steps of an investigation would include reading through all the files, interviewing the victim, suspect and any witnesses, review the area where the incident was reported to have occurred and reviewing housing for the victim and perpetrator. Since there are no cameras at WCF she is unable to rely on those but would gather any other evidence available such as clothing or phone calls. She stated she would judge credibility by looking at everything involved and ensuring a fair investigation is completed. She also verified they would not require a victim to submit to a polygraph or other truth-telling device. To try and determine if any staff actions, or inactions, contributed to the incident she would review staffing placement and training. She includes all the information she gathers in the administrative report and uses preponderance of evidence to substantiate any allegations.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.
- Site review observations:
 - No paper investigation files were observed during the site review.

115.71(h):

- ADM.08.08 states:
 - “Allegations of sexual abuse or sexual harassment that involve potentially criminal behavior shall be referred for investigation to local law enforcement. All referrals to law enforcement shall be documented. The policy describing such referrals, in addition to the investigative responsibilities of the DOC and local law enforcement, shall be published and maintained on the DOC’s website.”
- The WCF PAQ reported that no cases have been referred for prosecution since the last audit.
- Interviews with investigative staff:
 - The investigators stated that any referral for prosecution on felony cases would be done by the police department.

115.71(j):

- Interview with the investigator:
 - She stated they would continue the investigation if a staff member terminates employment prior to the investigation being completed or if a victim leaves the facility during the investigation including trying to contact them.

115.71(k):

- Auditor is not required to audit this provision.

115.71(l):

- Interview with the Warden:
 - The Warden stated that they would be notified of major movements in the criminal case by the police department.
- Interview with the PREA Coordinator:
 - She stated that the facility investigators would conduct the administrative case parallel to the local law enforcement detective conducting their investigation.
- Interview with the PREA Compliance Manager:
 - She stated that she would check in with the police department and also that the PREA Coordinator remains in contact with them.

The auditor finds the agency/facility in full compliance with PREA Provision §115.71 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Investigative staff <p>Findings:</p> <p>115.72(a):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR shall not impose an evidentiary standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.” ◦ This policy will be consulted with the relevant Labor Unions, such as the Hawaii Government Employees Association, United Public Workers, and an advisory should be provided to an excluded employee’s organization.” • Interview with investigative staff: <ul style="list-style-type: none"> ◦ The investigator stated that preponderance of the evidence is the standard used to substantiate cases. • As there were no reports or sexual abuse or sexual harassment in the past 12 months at WCF no files or findings were able to be reviewed. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.72 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024
- DCR 8317 PREA Mandated Reporting Form

Interviews Conducted:

- Warden
- Investigative staff

Findings:

115.73(a-b):

- The WCF PAQ reported that zero administrative and/or criminal investigations of alleged sexual abuse and sexual harassment were completed as there were no allegations in the past 12 months.
- ADM.08.08 states:
 - “Upon completion of an investigation (administrative or criminal) into an offender’s allegation that he/she suffered sexual abuse in a DCR facility, facility staff shall inform the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. (115.73 a)
 - If the facility or DCR did not conduct the investigation, the facility, or DCR shall request the relevant information from the external investigative agency in order to inform the offender of the results.”
- Form DOC 8317 is used to notify victims of the results of an investigation, the status of a criminal case or the employment status/location of the alleged staff abuser.
- Interview with the Warden:
 - The Warden stated that the victims receive notification following an investigation and that they coordinate with other facilities if they are transferred. He also stated that they keep record in their file that they received the notification.
- Interview with investigative staff:
 - The investigator said that the notification is completed using form 8317, mandatory reporting form. If the victim is no longer at WCF they would have the form served to them at the facility they were now at. She stated the signed form is kept in the file to verify they received the notification.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.

115.73(c-e):

- ADM.08.08 states:

- “Following an offender’s allegation that a staff member has committed sexual abuse against the offender, the facility or DCR shall subsequently inform the offender (unless DCR has determined that the allegation is unfounded) whenever:
 - The staff member is no longer posted within the offender’s unit;
 - The staff member is no longer employed at the facility;
 - The facility or DCR learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
 - The facility or DCR learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- Following an offender’s allegation that he/she has been sexually abused by another offender in a DCR facility, the facility or DCR shall subsequently inform the alleged victim whenever:
 - The facility or DCR learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
 - The facility or DCR learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
- The facility or DCR shall document all notifications to offenders described under this section on the PREA Mandated Reporting Form (DCR 8317). A copy of this form shall be forwarded to the Department PREA Coordinator via email, fax, or mail within three (3) days.
- The facility's or DCR's obligation to report under this section shall terminate if the offender victim is released from DCR's custody.”
- The WCF PAQ reported that there have been zero notifications provided in the past 12 months as there were no reports made.

115.73(f): Auditor is not required to audit this provision.

The auditor finds the agency/facility in full compliance with PREA Provision §115.73 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

Findings:

115.76(a):

- ADM.08.08 states:
 - “Staff are subject to disciplinary sanctions up to and including termination for PREA sexual abuse or sexual harassment policy violations.”

115.76(b):

- The WCF PAQ reported that they have had no incidents in the past 12 months where staff have violated agency sexual abuse or sexual harassment policies.
- ADM.08.08 states:
 - “Termination shall be the presumptive disciplinary sanction for all staff, who, after an investigation and a pre-disciplinary due process hearing, have been found to have engaged in sexual abuse.”
- As there were no staff who were reported to have violated agency sexual abuse or sexual harassment policies in the last 12 months there were no records to review.

115.76(c):

- ADM.08.08 states:
 - “Disciplinary sanctions for violations of DCR policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member’s personnel and disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar employment histories.”

115.76(d):

- ADM.08.08 states:
 - “All terminations for violations of PREA sexual abuse or sexual harassment policies, or resignations by staff, who would have been terminated, if not for their resignation, shall be reported to LE agencies, unless the activity was clearly not criminal.
 - DCR shall also report the incident to any relevant licensing body applicable to the staff member, such as but not limited to social work, educational, physician or nursing licensing bodies.”

	The auditor finds the agency/facility in full compliance with PREA Provision §115.76 based upon analysis of all available evidence including the documentation provided.
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Warden <p>Findings:</p> <p>115.77(a-b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “DCR requires that any contractor or volunteer, who engages in sexual abuse is prohibited from contact with inmates and shall be reported to county LE, unless the activity was clearly not criminal.” ◦ DCR shall also report the incident to any relevant licensing body applicable to the contractor or volunteer. ◦ DCR shall take appropriate remedial measures and consider whether to prohibit further contact with offenders in the case of any other violations not covered by the paragraph (1) of this section, such as sexual harassment by a contractor or volunteer.” • The WCF PAQ reported that there have been no incidents in which a contractor or volunteer were reported to law enforcement agencies or relevant licensing bodies. • There were no investigations or complaints regarding any contractors or volunteers in the past 12 months so there were no investigations to review. • Interview with the Warden: <ul style="list-style-type: none"> ◦ The Warden verified there have been no PREA related incidents involving volunteers or contractors in the past 12 months at WCF but if there were a report would be written, they would be banned from grounds and investigations would be notified.

	The auditor finds the agency/facility in full compliance with PREA Provision §115.77 based upon analysis of all available evidence including the documentation provided and interviews conducted.
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • DPS policy COR.13.03 Adjustment Procedures Governing Serious Misconduct Violations and the Adjustment of Minor Misconduct Violations, dated November 13, 2017 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Warden <p>Findings:</p> <p>115.78(a):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Offenders are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or sexual harassment.” • COR.13.03 Adjustment Procedures Governing Serious Misconduct Violations and the Adjustment of Minor Misconduct Violations provides guidelines and procedures for adjustments of misconducts for rule or directive violations. It includes definitions of prohibited behavior as well as possible sanctions for such conduct. • The WCF PAQ reported that in the past 12 months, there has been no administrative findings of inmate-on-inmate sexual abuse and no criminal findings of guilt for inmate-on-inmate sexual abuse <p>115.78(b):</p> <ul style="list-style-type: none"> • ADM.08.08 states:

- “Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the offender’s disciplinary history, and the sanctions imposed for comparable offenses by other offenders.”
- Interview with the Warden:
 - He stated that they would follow policy 13.03 Misconduct in regards to any disciplinary sanctions.

115.78(c):

- ADM.08.08 states:
 - “The disciplinary process shall consider whether an offender’s mental disability or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed.”

115.78(d):

- ADM.08.08 states:
 - “DCR medical and mental health staff shall provide therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse.
 - The medical, mental health, and facility staff shall consider whether to require the offending offender to participate in such interventions as a condition of access to programming, privileges, or other benefits.”

115.78(e):

- ADM.08.08 states:
 - “DCR shall discipline offenders for sexual conduct with staff only upon finding that the staff member did not consent to such contact. This type of incident shall result in a reassessment of the offender by utilizing the PREA Screening Tool (DCR 8314).”

115.78(f):

- ADM.08.08 states:
 - “DCR shall not discipline an offender for reporting sexual abuse made in good faith and based upon a reasonable belief that the alleged conduct occurred. This is applicable if an investigation does not establish evidence sufficient to substantiate the allegation.”

115.78(g):

- ADM.08.08 states:
 - “DCR prohibits all sexual activity or sexual contact between offenders and shall discipline offenders for such activity or contact. DCR shall

	<p>not deem such activity to constitute sexual abuse, if it determines that the activity is consensual or not coerced.”</p> <ul style="list-style-type: none"> • COR.13.03 Adjustment Procedures Governing Serious Misconduct Violations and the Adjustment of Minor Misconduct Violations outlines the infractions for inmates for sexual conduct. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.78 based upon analysis of all available evidence including the documentation provided and interviews conducted.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Staff Responsible for Risk Screening • Medical Staff <p>Site Review Observations</p> <p>Findings:</p> <p>115.81(a-c):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Any offender who has disclosed a prior sexual victimization during an intake screening pursuant to §24.0 of this policy, whether it occurred in an institutional setting or in the community, shall be offered a follow-up meeting with a medical or mental health practitioner within fourteen (14) days of the intake screening. ◦ Any offender who has disclosed any previous perpetration of sexual abuse during an intake screening pursuant to §24.0 of this policy shall be offered a follow-up meeting with a mental health practitioner within fourteen (14) days of the intake screening.”

- The WCF PAQ reports that 100% of inmates who disclosed prior victimization during screening were offered a follow-up meeting with medical or mental health.
- Site review observations:
 - During the site review the audit team observed that most records are kept electronically or in locked cabinets.
- Interviews with inmates who disclosed victimization during risk screening were unable to be conducted as no one who had disclosed was housed at WCF during the on-site portion of the audit.
- Interviews of staff responsible for risk screening:
 - A staff member who completes the risk screening was interviewed and stated they rarely have anyone report prior victimization or perpetration but if they did she would notify the PREA Compliance Manager.

115.81(d):

- ADM.08.08 states:
 - “Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to formulate treatment plans and/or security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by federal, State, or local law. ”
- During the site review security staff were asked if they had access to medical or mental health records and all stated they did not.

115.81(e):

- ADM.08.08 states:
 - “Medical and mental health staff shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in an institutional setting unless the offender is under the age of eighteen (18). This provision is not applicable to non-medical or non-mental health staff.”
- Interviews with medical staff:
 - Two medical staff were interviewed and they confirmed that WCF does not hold inmates under the age of 18 and that they would get informed consent before reporting about prior victimization that did not occur in an institutional setting.

The auditor finds the agency/facility in full compliance with PREA Provision §115.81 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Medical staff <p>Site Review Observations</p> <p>Findings:</p> <p>115.82(a):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “Offender victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which will be determined by medical and mental health staff according to their professional judgment.” • Interviews with medical staff: <ul style="list-style-type: none"> ◦ Two medical staff were interviewed and stated that inmates receive timely and unimpeded access to emergency medical treatment and crisis intervention services typically immediately after being reported. They stated that, if needed, tele-psych is available. They also stated that the nature and scope of services are determined according to their professional judgment. • Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months. <p>115.82(b):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “If qualified medical or mental health staff are not on duty at the time of the report of a recent sexual abuse, the security staff or first responder shall take preliminary steps to protect the victim as dictated by §32.0 and §35.0. ◦ If qualified medical and mental health staff are not on duty at the time of the report of a recent sexual abuse, they shall be immediately notified either by telephone contact to the on-call physician or when

reporting for duty.”

- Interviews with staff first responders:
 - Two staff who may/have acted as first responders were interviewed and both stated that they would separate the victim from the suspect, secure the crime scene and make appropriate notifications through the chain of command.

115.82(c):

- ADM.08.08 states:
 - “Offender victims of sexual abuse, while incarcerated shall be offered timely information about and provided timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with the professionally accepted community standards of care, where medically appropriate.”
- Interviews with medical staff:
 - Both medical staff interviewed stated that victims of sexual abuse would be offered timely information about access to sexually transmitted infection, including HIV prophylaxis.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.

115.82(d):

- ADM.08.08 states:
 - “Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.”

The auditor finds the agency/facility in full compliance with PREA Provision §115.82 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed:

- WCF PAQ
- DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024

Interviews Conducted:

- Medical staff

Site Review Observations

Findings:

115.83(a-b):

- ADM.08.08 states:
 - “DCR shall offer medical and mental health evaluations and, as appropriate, treatment to all offenders (including external referrals), who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.
 - The evaluation and treatment of such victims includes, 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.”
- Interviews with medical staff:
 - Two medical staff were interviewed and they detailed what the evaluation and treatment of offenders who have been victimized would entail including providing any urgent medical care and assessing for injuries and trans[ort to the hospital if warranted.
- Interviews with inmates who reported sexual abuse were unable to be conducted as no reports of sexual abuse were made at WCF in the past 12 months.

115.83(c, g):

- ADM.08.08 states:
 - “DCR shall provide offender victims of sexual abuse with medical and mental health services consistent with the community standard level of care.
 - Treatment services shall be provided to the offender victim without financial cost and regardless of whether the offender victim names the abuser or cooperates with any investigation arising out of the incident.”

115.83(d): This section is not applicable since WCF is an all-male facility.

115.83(e): This section is not applicable since WCF is an all-male facility.

115.83(f):

- ADM.08.08 states:
 - “Offender victims of sexual abuse which incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.”

115.83(h):

- ADM.08.08 states:
 - “Mental health staff shall attempt to conduct a mental health evaluation of all known offender-on-offender abusers within sixty (60) days of learning of such abuse history and offer treatment, when deemed appropriate.”

The auditor finds the agency/facility in full compliance with PREA Provision §115.83 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.

115.86 Sexual abuse incident reviews	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • DCR 8319 PREA Sexual Abuse Incident Review Report <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • Warden • PREA Compliance Manager • Incident Review team <p>Findings:</p> <p>115.86(a-c):</p> <ul style="list-style-type: none"> • The WCF PAQ reported that there were no criminal and/or administrative investigations of alleged sexual abuse completed at the facility during the review period so no completed examples were able to be reviewed.

- ADM.08.08 states:
 - “The Warden in conjunction with the Facility PREA Compliance Manager shall schedule a Sexual Abuse Incident Review (SAR) at the conclusion of every sexual abuse investigation that renders a finding that the allegation was substantiated or unsubstantiated unless the allegation has been determined to be unfounded.
 - SAR shall ordinarily occur within thirty (30) days of the when the Warden has been informed of the conclusion of the investigation and its findings, excluding allegations determined to be unfounded.
 - SAR Team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health staff. One individual should be identified as the Recorder or Reporting Staff Member.
 - The SAR Team shall document the following information on the Sexual Abuse Incident Review Report form (DCR 8319):
 - Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
 - Consider 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;
 - Examine the area in the facility, 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; and
 - The Recorder or Reporting Team Member shall prepare a report by utilizing the Sexual Abuse Incident Review Report form (DCR 8319) to document the SAR Team’s findings, including but not limited to a determination made pursuant to paragraphs (4a-4e) of this section, and any recommendations for improvement.
 - The SAR Team’s report shall be forwarded to the Warden to review and complete the Warden’s Response Section. The Warden shall decide as to whether the recommendations of the SAR Team will be implemented or document the reasons for not implementing the recommendations of the SAR Team.
 - The Warden shall then retain a copy and distribute the completed Sexual Abuse Incident Review Report to the Institutions Division Administrator (IDA), the Facility PREA Compliance Manager and the Department PREA Coordinator.
 - PREA incidents involving DCR Lockups, requires the DCR PREA Coordinator and the Sheriff to conduct a sexual abuse incident review

at the conclusion of every sexual abuse investigation, including where the allegation has been substantiated or unsubstantiated, unless the allegation has been determined to be unfounded.

- DCR 8319 PREA Sexual Abuse Incident Review Report shows the format and requirements for an incident review. It shows who the review team consists of and shows that all required information from this standard is to be reviewed for each case.
- Interview with the Warden:
 - The Warden said that WCF does have an incident review team and that it includes the Chief of Security, the investigator, the PREA Compliance Manager, medical staff and physical plant staff.

115.86(d):

- ADM.08.08 requires:
 - “The SAR Team shall document the following information on the Sexual Abuse Incident Review Report form (DCR 8319):
 - Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
 - Consider 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;
 - Examine the area in the facility, 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; and
 - The Recorder or Reporting Team Member shall prepare a report by utilizing the Sexual Abuse Incident Review Report form (DCR 8319) to document the SAR Team’s findings, including but not limited to a determination made pursuant to paragraphs (4a-4e) of this section, and any recommendations for improvement.”
- Interview with the Warden:
 - The Warden said that they review the allegation and verify staff were completing assigned functions such as rounds as required. He verified they consider any motivations and also examine the area if needed.
- Interview with the PREA Compliance Manager:
 - She stated that she is included in the incident reviews and verified there have been none in the past year. She stated during reviews in previous years they have requested cameras.
- Interview with a member of the incident review team:

- The incident review team member was interviewed and reported that they consider all required elements during an incident review including examining the area of the facility where the incident allegedly occurred, access staffing level and evaluating monitoring technology.
- Per the DOJ memo titled "National PREA Standards Alignment with Executive Order 14168" dated December 2, 2025 this auditor is not auditing the following section: 115.86(d)(2).

115.86(e):

- ADM.08.08 states:
- "The Recorder or Reporting Team Member shall prepare a report by utilizing the Sexual Abuse Incident Review Report form (DCR 8319) to document the SAR Team's findings, including but not limited to a determination made pursuant to paragraphs (4a-4e) of this section, and any recommendations for improvement. The SAR Team's report shall be forwarded to the Warden to review and complete the Warden's Response Section. The Warden shall decide as to whether the recommendations of the SAR Team will be implemented or document the reasons for not implementing the recommendations of the SAR Team."

The auditor finds the agency/facility in full compliance with PREA Provision §115.86 based upon analysis of all available evidence including the documentation provided and interviews conducted.

115.87 Data collection	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • Agency Annual PREA Report, CY2023 • Survey of Sexual Victimization (SSV), 2023 <p>Findings:</p> <p>115.87(a-f):</p> <ul style="list-style-type: none"> • ADM.08.08 states:

- “The Department PREA Coordinator shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control by utilizing a standardized format based on PREA definitions.
- The standardized format includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. (115.87 a/c)
- The Department PREA Coordinator shall aggregate the incident based sexual abuse data at least annually. (115.87 b)
- The Department PREA Coordinator shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and SARs. (115.87 d)
- At least once a year, the Mainland Branch Unit shall report to the Department PREA Coordinator all incident-based and aggregated data from any private facility with whom it contracts for the confinement of DCR offenders. (115.87 e)
- DCR shall provide all such data from the previous calendar year to the Department of Justice’s Survey of Sexual Violence, no later than June 30th of each year. (115.87 f)”
- The SSV forms were reviewed that show they were completed for 2023. 2023 would be the most recent report requested for submission.
- The auditor reviewed the agency's website and it includes the PREA annual reports from 2011-2023 and the Act 194 Sexual Assaults in Correctional Facilities reports from 2011-2025. In addition the website shows the audit reports from the one contract facility in Arizona.

The auditor finds the agency/facility in full compliance with PREA Provision §115.87 based upon analysis of all available evidence including the documentation provided and interviews conducted.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documentation reviewed:
	<ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 • PREA Annual Report, CY2023 • Agency Website

Interviews Conducted:

- Agency Head
- PREA Coordinator

Findings:

115.88(a-d):

- ADM.08.08 states:
 - “The Department PREA Coordinator shall review data collected and aggregated pursuant to §50.0 of this policy to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:
 - Identifying problem areas; and
 - Taking corrective actions on an ongoing basis.
 - The Department PREA Coordinator shall prepare an annual report of DCR’s findings and any corrective actions for each facility, as well as the agency as a whole and as dictated by HRS §353-C8.
 - This report shall include a comparison of the current year’s data and corrective actions with those from prior years. The annual report shall provide an assessment of DCR’s progress in addressing sexual abuse.
 - This report shall be approved by the Director and be made readily available to the public through DCR’s departmental website.
 - DCR may redact specific material when publication would present a clear and specific threat to the safety and security of a facility. A notation should be made to indicate the nature of the material redacted.”
- The agency annual PREA reports were reviewed and this auditor verified they contain all information required in this standard, including a report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.
- This auditor verified the annual report is available on the agency’s website at <https://dcr.hawaii.gov/policies-and-procedures/pp-prea/>.
- Interview with the Agency Head:
 - He stated that incident based sexual abuse data is used to assess and improve sexual abuse prevention, detection and response by conducting after actions reviews to see what can be done better.
- Interview with the PREA Coordinator:
 - The PREA Coordinator stated that the agency does review data collected and aggregated pursuant to 115.87 and that it is securely retained. She also confirmed that corrective action would be taken if/when necessary based on the data.

	The auditor finds the agency/facility in full compliance with PREA Provision §115.88 based upon analysis of all available evidence including the documentation provided and interviews conducted.
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documentation reviewed:</p> <ul style="list-style-type: none"> • WCF PAQ • DCR policy ADM.08.08: Prison Rape Elimination Act, dated January 1, 2024 <p>Interviews Conducted:</p> <ul style="list-style-type: none"> • PREA Coordinator <p>Site Review Observations</p> <p>Findings:</p> <p>115.89(a-d):</p> <ul style="list-style-type: none"> • ADM.08.08 states: <ul style="list-style-type: none"> ◦ “The Department PREA Coordinator shall ensure that the incident-based and aggregated data are securely retained. ◦ The Department PREA Coordinator shall 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 DCR’s departmental website. ◦ The Department PREA Coordinator shall remove all personal identifiers and comply with federal and state statutes, HRS §92(F), Uniform Information Practices Act, prior to publishing the data. ◦ The Department PREA Coordinator shall maintain the sexual abuse data collected based on §50.0 for at least ten (10) years after the date of the initial collection, unless federal, state, or local law requires otherwise.” • Interview with the PREA Coordinator: <ul style="list-style-type: none"> ◦ She stated that all data collected is securely retained. • Site review observations: <ul style="list-style-type: none"> ◦ During the site review no paper files regarding the PREA standards

	<p>were observed.</p> <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.89 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documentation reviewed:</p> <p>115.401(a-b):</p> <ul style="list-style-type: none"> • The auditor reviewed the agency's website at https://dcr.hawaii.gov/policies-and-procedures/pp-prea/ and verified the agency has posted the final PREA audit reports for all facilities. <p>115.401(h):</p> <ul style="list-style-type: none"> • During the on-site portion of the audit the audit team was able to access and view all areas of the facility. <p>115.401(i):</p> <ul style="list-style-type: none"> • WCF provided all requested documents in a timely manner and was able to view the electronic system onsite where documents are stored. <p>115.401(m):</p> <ul style="list-style-type: none"> • WCF provided areas for the auditors to use which provided enough space to conduct private interviews of inmates and staff where others were unable to hear the conversations. <p>115.401(n):</p> <ul style="list-style-type: none"> • The auditor received no letters from WCF inmates. The audit notice was observed to be posted throughout the facility. Photos of the audit notice postings were received via email six weeks before the onsite portion of the audit.

	The auditor finds the agency/facility in full compliance with PREA Provision §115.401 based upon analysis of all available evidence including the documentation provided, the site review and interviews conducted.
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.403(f):</p> <ul style="list-style-type: none"> • The auditor reviewed the agency's website at https://dcr.hawaii.gov/policies-and-procedures/pp-prea/ and verified the final audit reports for all facilities are posted. <p>The auditor finds the agency/facility in full compliance with PREA Provision §115.403 based upon analysis of all available evidence including the documentation reviewed.</p>

Appendix: Provision Findings

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

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

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

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

	facility does not have female inmates.)	
115.15 (c) Limits to cross-gender viewing and searches		
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
115.15 (d) Limits to cross-gender viewing and searches		
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e) Limits to cross-gender viewing and searches		
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.15 (f) Limits to cross-gender viewing and searches		
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.16 (a) Inmates with disabilities and inmates who are limited English proficient		
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes

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

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

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

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

	whichever is later.)	
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes

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

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

	inmates on how to avoid inappropriate relationships with inmates?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b) Employee training		
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c) Employee training		
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d) Employee training		
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a) Volunteer and contractor training		
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b) Volunteer and contractor training		
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how	yes

	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)?	
115.32 (c) Volunteer and contractor training	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a) Inmate education	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b) Inmate education	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c) Inmate education	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d) Inmate education	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes

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

	prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na

115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	na
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes

	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	

	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Work Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.43 (a)	Protective Custody	

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

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

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

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

	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between	yes

	inmates and these organizations and agencies, in as confidential a manner as possible?	
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a	yes

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

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

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

	of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassessments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations,	yes

	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).)	
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes

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

	order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	
115.73 (c) Reporting to inmates		
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d) Reporting to inmates		
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually 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

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

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

	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.)	
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	

	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

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

	has been determined to be unfounded?	
115.86 (b) <i>Sexual abuse incident reviews</i>		
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c) <i>Sexual abuse incident reviews</i>		
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d) <i>Sexual abuse incident reviews</i>		
	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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e) <i>Sexual abuse incident reviews</i>		
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a) <i>Data collection</i>		
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b) <i>Data collection</i>		

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

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

(b)		
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse	yes

	noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	
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