

# PREA Facility Audit Report: Final

**Name of Facility:** Central Virginia Regional Jail

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 12/19/2019

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" 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 checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Ron L Kidwell	<b>Date of Signature:</b> 12/19/2019

AUDITOR INFORMATION	
<b>Auditor name:</b>	Kidwell, Ron
<b>Address:</b>	
<b>Email:</b>	ronnie.kidwell@yahoo.com
<b>Telephone number:</b>	
<b>Start Date of On-Site Audit:</b>	10/23/2019
<b>End Date of On-Site Audit:</b>	10/25/2019

<b>FACILITY INFORMATION</b>	
<b>Facility name:</b>	Central Virginia Regional Jail
<b>Facility physical address:</b>	13021 James Madison Hwy, Orange, Virginia - 22960
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	Brian Bachert
<b>Email Address:</b>	bbachert@cvrj.org
<b>Telephone Number:</b>	540-672-3222

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Frank Dyer III
<b>Email Address:</b>	fdyer@cvrj.org
<b>Telephone Number:</b>	540-672-3222

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	
<b>Name:</b>	Brian Bachert
<b>Email Address:</b>	bbachert@cvrj.org
<b>Telephone Number:</b>	540-672-3222 ext. 835

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	442
<b>Current population of facility:</b>	422
<b>Average daily population for the past 12 months:</b>	426
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	
<b>Age range of population:</b>	18-71
<b>Facility security levels/inmate custody levels:</b>	minimum, medium, maximum
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	141
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	10
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	51

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Central Virginia Regional Jail Authority
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	13021 James Madison Hwy, Orange, Virginia - 22960
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Jonathan Hoffman	<b>Email Address:</b>	jhoffman@cvrj.org

## AUDIT FINDINGS

### **Narrative:**

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

### Pre-Audit Phase

The Prison Rape Elimination Act (PREA) Audit of the Central Virginia Regional Jail (CVRJ) requested a PREA audit be conducted by Systematic Audits LLC on 07/15/2019. The facility had been previously audited on 11/23/2016. On 07/19/2019 an introductory meeting was arranged to discuss several important topics. Those topics included the process needed to utilize the Online Audit System (OAS), posting the Audit Notice at least 6 weeks in advance, and an initial timeline for the audit. The meeting took place at the CVRJ facility. Present at the meeting were Major Ronnie Davis (Chief, Inmate Services), Lieutenant Brian Bachert (PREA Compliance Manager), and Ron Kidwell (Systematic Audits LLC PREA Auditor).

On 08/07/2019 a proposal for the audit was sent to the CVRJ facility. We met again on 08/15/2019 and signed a contract between the CVRJ and Systematic Audits to perform a PREA audit. During this meeting a request was made by the PREA Manager that a pre-facility tour be provided prior to the on-site audit phase. The purpose of this tour was to help identify any possible blind spots that may exist within the facility. Unsure of the parameters surrounding this request the auditor reached out to the PREA Resource Center (PRC) for guidance. On 08/16/2019 the auditor received a response from the PRC acknowledging if the auditor chose to oblige the facility's request that a pre-facility audit was appropriate. Also, on 08/16/2019 the pre-audit report was sent to the PREA Manager of the CVRJ to fill out and begin the process of gaining access to the Online Audit System.

On 08/17/2019 copies of the PREA AUDIT Notice (in both English and Spanish) were sent to the PREA Compliance Manager via e-mail. The PREA notice communicates to staff and inmates that the facility will be undergoing an audit for compliance with DOJ standards to detect, prevent, and respond to prison rape. The notice identifies the on-site dates of the audit and provides a confidential way to communicate with the auditor through the auditor's personal contact information. The notice also spells out how the confidential information is to be handled and when the confidential information must be reported. In addition, the email provided specific instructions to post the notices at least six weeks in advance of the scheduled on-site phase. The audit notices needed to be posted throughout the facility, in places where it would be visible to all inmates and staff (e.g., visiting areas, housing units, and recreational spaces.). Also, the correspondences between the inmates and auditor needed to be treated as legal mail and to confirm that the notices were posted in the appropriate time frame by date stamped photographs of the posters throughout the facility. On 08/19/2019 the PREA Manager sent me date stamped photographs of posted PREA Audit Notices from the facility.

On 08/19/2019 the auditor received a request from the OAS tech support requesting further information on the CVRJ PREA Coordinator. This information was relayed to the PREA Manager who provided the auditor with the necessary information. After a ten-day period of no advancement, the auditor contacted the CVRJ PREA Manager to see if there were any issues that needed to be worked through. The PREA Manager informed the auditor that he was waiting on the Superintendent to return to complete the PREA Audit Report. On 09/06/2019 the CVRJ was granted access to the OAS and the PREA Audit Questionnaire began to be worked on.

On 09/26/2019 the Auditor sent the PREA Manager an email requesting information and documentation that was needed. The information requested was to provide contact information on local advocacy groups (and) to agree on a date the Pre-Audit Questionnaire would be completed, (In addition it also requested) to have office space with internet access, the permissibility to use personal tech items (i.e. laptop, cellphone), a diagram of the facility, and the names of all the inmates that alleged sexual abuse or sexual harassment in the last twelve months. The list consisted of 19 allegations. The Auditor received all the requested information by close of business the following day. Also, on the evening of 09/26/2019, the auditor conducted a pre-facility tour as previously requested by the CVRJ. The purpose of the tour was to assist in identifying possible blind spots that may need additional camera coverage. At the conclusion of the tour, the auditor did make two recommendations for both initial and additional camera coverage. One of the areas of concern was in the law library. The library is located adjacent to a control booth and in the same office space as the classification offices. During normal working hours staff is located within the vicinity., However, during weekends and holidays the supervision is left up to a roving officer, who makes checks twice an hour. Camera coverage would enhance the safety and security in this area when Classification staff is not working. The second area of concern was in the C and D housing units that have no camera coverage. These units are monitored by a staff member who is posted in an elevated overlook workspace observing two separate units. There is also a roving officer making floor checks twice an hour. During this tour the auditor was also able to visually confirm that the PREA Audit Notice were posted in every housing unit and in the public areas.

On 09/27/2019 the auditor received a notification from the PREA Resource Center indicating that the Pre-Audit Questionnaire had been submitted by the CVRJ and ready for review.

On 10/04/2019 I contacted the Sexual Assault Resource Agency (SARA) located in Charlottesville, Virginia. I spoke to the Director of the center who informed me that her agency is a crisis center that serves the residents of the counties of Albemarle, Nelson, Louisa, Fluvanna, and Greene. They provide a twenty-four-hour crisis hotline, emergency room advocacy, trauma-informed therapy, and legal advocacy. This crisis center has been serving the residents of this area for the last forty years. The Director stated that they do not have a memorandum of understanding (MOU) with the CVRJ, and her agency has not received any allegations of sexual abuse or sexual harassment from any inmate or staff associated with the CVRJ within the last twelve months. The auditor also reviewed the CVRJ website, reviewed the mandatory reporting laws, and performed an internet research on the CVRJ. However, nothing of relevance related to the safety or prevention of sexual abuse was found.

On 10/6/2019 the auditor contacted Just Detention asking if their organization had any information about sexual safety at the CVRJ facility.especially any information related to reported cases of sexual abuse or sexual harassment. Just Detention advised the auditor that they had not received any information related to sexual safety from any individual associated with the CVRJ.

During the review phase of the Pre-Audit Questionnaire the auditor noticed that there was no standing MOU indicating who conducted criminal investigations. The PREA Manager was contacted and asked this question. The PREA Manager explained the Virginia State Police (VSP) conducted all criminal sexual assault investigations at the CVRJ. However, the PREA Manager has been unable to secure a MOU with the State Police due to their reluctance and have not had any recent progress. The auditor requested evidence be provided to show the good faith efforts made on the behalf of the CVRJ. On 10/04/2019 the auditor contacted the VSP Division II Bureau of Investigation to ascertain if they did in fact conduct alleged sexual assault criminal investigations at the CVRJ facility. The auditor's contact information was left for a detective to return the call. On 10/07/2019 the auditor received a phone call from a First Sergeant Detective with the VSP Division II Bureau of Investigation Unit. He informed me that they do in fact investigate all criminal sexually assault allegations and acknowledged that the only requirement needed to send an investigator is an official request from the facility.

The PREA auditor completed the review of all the documentation that was provided by the CVRJ staff in

the Pre-audit Questionnaire. The documentation is supposed to help support how a facility is establishing a baseline for its actual practice of zero tolerance for sexual abuse and sexual harassment. The auditor identified gaps or issues that needed to be followed up on and in some cases requested additional information. The request was captured on an easy to review document called an Issue Log the Log is used to outline requests for response to questions that need to be clarified during the audit process. The auditor submitted his Issue Log to the CVRJ on 10/07/2019 containing thirty-two requests for additional information.

On 10/10/2019 an email was sent to the PREA Manager of the CVRJ facility requesting lists for the interview selection and lists for document sampling. The lists consisted of individuals with specific responsibilities as it relates to PREA and individuals who have the authority to change policy. The list included individuals such as the Agency Head, Superintendent, PREA Coordinator, PREA Investigators, Medical staff and more. Also included was a request for a complete staff roster, (and) lists of contractors and volunteers that have contact with inmates. Inmates that have reported sexual victimization during risk screening, LGBTQ inmates, inmates with disabilities, inmates who are limited English proficient, inmates who reported sexual abuse and more. Finally, the auditor requested all investigations related to sexual abuse or sexual harassment over the last twelve months. When sampling documentation the auditor is reviewing files in three separate categories. There are employee files, inmate files, and investigative files. The auditor provided the CVRJ with a list of specific files in each category to be reviewed.

On 10/11/2019 the auditor contacted the victim advocacy group that the CVRJ facility has a contractual MOU with. The Services to Abused Families (SAFE) is a free and confidential rape crisis center that provides a twenty-four hour hotline, shelter, legal advocacy, and supportive counseling. SAFE was established in 1980 and is located in Culpeper County Virginia. The center provides services for the residents of Fauquier, Madison, Orange, Rappahannock, and Culpeper counties. During a phone interview the Community Outreach Coordinator acknowledged the services offered to the CVRJ facility. She informed me that the center provides a toll free twenty-four hour seven days a week hotline service. Along with victim advocacy and counseling to those who request it. She also stated that the advocate would be present at all medical forensic examinations and witness interviews if requested by the victim. SAFE does not report any allegations of sexual abuse made by inmates to anyone without permission from the inmate. Therefore, SAFE is not considered an outside reporting entity.

On 10/11/2019 the auditor arranged a call with the CVRJ PREA Compliance Manager. The call was to codify the logistics of scheduling interviews with specialized staff, contractors, volunteers, inmates, and staff on different work rotations. We also discussed the Issue Log and what specifically the auditor was looking for as proof of documentation or policy. All requested lists and documentation have been provided to the PREA auditor prior to the beginning of the onsite phase of this PREA audit.

On 10/15/2019 the PREA auditor conducted a Sexual Assault Nurse Examiner (SANE) interview by phone with the SANE Nurse Manager of the University of Virginia Hospital (UVA), located in Charlottesville, Virginia. A SANE nurse is a highly skilled certified nurse trained in the art of evidence collection and chain of custody. The nurse is considered the subject matter expert in collecting evidence after an alleged sexual assault has occurred. The nurse is also required to provided testimony in court cases related to sexual abuse. The Nurse explained that she was aware of the MOU between her agency and the CVRJ facility when it comes to conducting SANE exams. She explained that UVA Hospital has current MOU's with all the surrounding confinement detention facilities to provide forensic medical exams. When asked if the UVA Hospital Forensics Unit is responsible for conducting all forensic medical exams for the CVRJ facility, the Nurse Manager stated that the UVA Hospital is the only hospital in the area that offers forensic services. When asked if SANE staff are unavailable to conduct forensic medical examinations, who assumes the responsibility? The Nurse Manager replied that her staff is available 24 hours a day, 7 days a week, 365 days a year. A SANE nurse is always made available.

At this time the PREA auditor has not received any confidential communication (mail) from the

incarcerated inmates housed at the CVRJ facility. The confidential mail would be the product of the PREA Audit Notice postings throughout the CVRJ facility.

#### On-Site Audit

On 10/23/2019, at approximately 0830 hours, a PREA audit kickoff meeting was conducted. Present at the meeting was facility staff leadership, civilian administrative employees, and medical/mental health professionals. 16 staff members in all. The meeting was designed to create a positive working relationship, place names with faces, and prepare for the next three days. Soon after the conclusion of the meeting the auditor began the facility observation tour. Accompanied by both the PREA Coordinator and Compliance Manager the tour covered the entire facility over the next 5 hours. The auditor observed the intake area and sat through a classification / PREA screening process. The auditor observed the outside warehouse, cafeteria, visiting area, infirmary, every housing unit, and private offices. During this tour the auditor looked at camera placement for possible blind spots and inmate to officer ratio. The auditor looked at privacy issues such as how the toilet and shower areas were configured and did the inmates have adequate privacy. Also, if staff of the opposite gender announce their presents when entering a housing unit of the opposite sex. The auditor documented if PREA posters and PREA audit notices were displayed in the housing units and public areas as well. The auditor noted the number of phones in each unit and if the advocacy hotline number along with the outside reporting entity contact information was readily available in the housing units. The auditor also requested and observed an inmate conduct a test call to the outside entity to prove the effectiveness of the facility's practice. The auditor also spoke to multiple inmates about if they knew how to report an allegation of sexual abuse. On 10/23/2019, at approximately 1410 hours the PREA auditor began the interviewing process. For the rest of the evening the auditor completed seven random staff interviews and one volunteer interview. This process continued over the next 2 days until 10/25/2019. Over that 3-day period the auditor conducted 58 interviews with staff and inmates. This included the agency leadership, which consisted of the Commander of Operations, PREA Coordinator, PREA Compliance Manager, and Director of Training. In addition, the auditor interviewed 19 specialized staff. Listed below is the sample of specialized staff that was interviewed:

- Agency Head / Facility Head
- PREA Coordinator
- PREA Compliance Manager
- Intake Officer
- Non -Medical staff conducting strip searches
- Intermediate – Higher level staff
- Medical Staff
- Staff performing risk screening
- Human Resources Staff
- Agency Contract Administrator
- Volunteer
- First Responder
- Investigative Staff
- Staff member monitoring retaliation
- Incident Review Team member
- Mental Health Staff
- Staff supervising inmates in segregated housing
- Contractor
- SANE Nurse

The selection of specialized staff also included several individuals who held multiple roles and responsibilities covered by the protocols. For example, the PREA Compliance Manager was also responsible for monitoring retaliation and responsible for conducting administrative investigations. During the interview process 12 random staff were interviewed. The staff were randomly selected by the PREA auditor. The auditor chose staff from all shifts, working different assignments, and with different levels of experience. The auditor also made sure interviews were conducted with a proportionate amount of female staff corresponding to the CVRJ's employee demographics.

The CVRJ provided the auditor a list of 26 volunteers and 12 contractors that have contact with inmates. However, during the 3-day on-site visit the auditor was only able to interview 1 volunteer and 1 contractor due to availability. The volunteer was contacted by the PREA Manager and made himself available just for the purpose of conducting an interview for the PREA auditor. The contractor interviewed was the contracted medical doctor for the facility that provides services once a week.

During this audit 13 random inmates were chosen to be interviewed. At the time of this audit there were approximately 424 inmates housed at this facility. The auditor chose the names at random by going down the inmate roster by housing location. Age, institutional experience, and housing assignments were taken into consideration when making these selections.

Lastly, the CVRJ provided the auditor with 140 possible targeted inmates currently being housed in the facility. Of those 140 identified, 118 reported sexual victimization during the risk screening process, 2 reported sexual abuse, 3 LGB, 7 physically disabled, 9 inmates that were limited English proficient, and 1 with a cognitive disability. The CVRJ does not house youthful offenders; they reported no transgender inmates, no inmates housed in segregation for high risk, and no inmates that were blind or deaf. During the pre-audit and on-site audit phases the auditor had not discovered any evidence to the contrary that would suggest these statements by the CVRJ about their targeted inmate population are accurate.

During the three-day audit 14 targeted inmates were interviewed covering 18 protocols. The targeted interviews are categorized by the following:

- 3 Physically disabled
- 1 Limited English Proficient
- 1 Cognitively disabled
- 3 LGB
- 4 Reported sexual abuse
- 6 Reported sexual victimization during risk screening

At the conclusion of the second day of the audit the auditor recognizing there would not be enough time on the final day to conduct a thorough file review. The auditor requested that the PREA Manager provide him with a predetermined list of investigations, inmate files, and staff personnel files selected by the auditor. The PREA Manager was given an encrypted thumb drive and loaded the requested files to be taken with the auditor.

The PREA auditor reviewed a total of 50 files. Those files consisted of 26 inmate files, 14 staff personnel files, and 10 investigative files. The inmate files consisted of those 3 inmates that had been previously interviewed during the audit that reported sexual abuse along with others that had been identified as possible targeted inmates. The staff personnel files were selected by random and several files were selected because staff members had been identified in investigations alleging sexual abuse and sexual harassment.

Of the 10 investigative files reviewed the following information was extracted. There were 4 investigations involving staff on inmate allegations and 6 investigations involving inmate on inmate allegations. There were 3 sexual abuse allegations and 6 allegations of sexual harassment with 1 case involving voyeurism. When classifying the final dispositions there was 1 investigation that were unsubstantiated, 5 unfounded, and 1 that was substantiated. Lastly, the Virginia State Police was contacted 1 time.



## AUDIT FINDINGS

### Facility Characteristics:

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

### Facility Characteristics

The Central Virginia Regional Jail is located on the outskirts of the Town of Orange, Virginia. The Regional Jail supports five separate counties. Those counties are Orange, Louisa, Greene, Madison, and Fluvanna. As of 2018, the United States projected census estimates a population of 35,265 (persons) living in the County of Orange. The size of Orange County is 343 square miles. The population of Louisa County is 36,778 with a size of 514 square miles. The County of Greene is 156 square miles with a population of 19,779. Madison County is 322 square miles and a population of 13,295. Finally, Fluvanna County has a population of 26,783 and its size is 290 square miles. The facility is overseen by a Jail Board consisting of the 5 county Sheriffs, the CVRJ Superintendent, Jail Attorney, and five at large members. The CVRJ became operational in September of 1990 and was created to permit the sharing of resources across jurisdictional lines in a somewhat rural area. This facility is separated into 3 sides, the Northside, Southside, and Eastside. The jail is one large building made up of 21 housing units. The jail's inmate population capacity is 442 inmates with 141 facility staff. The daily population on the first day of this audit was 424 inmates. The CVRJ currently houses minimum, medium, and maximum custody levels. Northside:

Consists of 7 housing units. A, B, C, D, E, F and male segregation.

#### A Block:

Is an open bay dorm-style housing unit. The PREA information was posted high on the outside wall opposite of the television. The audit notice was not present, so the auditor interviewed an inmate housed in the unit that stated the notice had previously been posted, but someone (inmate) had torn it down. There are cameras mounted inside the housing unit. Auditor engaged in general discussion with an inmate that stated he has reviewed the PREA information and would report by writing a request form. There is a phone bank with 3 phones inside the block, mounted on the wall. This block can house 22 inmates with an officer stationed at an elevated position and one officer roaming. Showers and toilets are enclosed to provide privacy.

#### B Block:

Is a multiple occupancy cell-housing unit. The PREA information was posted, as was the Audit Notice. There are multiple cameras mounted inside the housing unit, and a bank of 3 phones mounted on the perimeter wall. This block can house 22 inmates with an officer stationed at an elevated position and one officer roaming. Showers and toilets are enclosed to provide privacy.

#### C, D, E, F Block:

These 4 blocks are currently being renovated and are completely empty at this time. The auditor witnesses ongoing construction inside these blocks during the on-site phase. Blocks D, E, and F are multiple occupancy housing units and C block is a single cell-housing unit.

#### Segregation Block:

Is a single cell-housing unit that is made up of 8 single housing cells. The PREA information was posted as was the Audit Notice. There are cameras located in the hallway and each cell has a camera located inside the cell. There are privacy factors that have been put in place to protect inmates from opposite

gender viewing. The unit utilizes one rolling phone and an announcement was made by a female officer prior to staff entering the unit. The auditor also reviewed the logbook notating that random checks were made by supervisors. The shower area provides privacy with a half shower door.

#### Booking:

Is a single cell housing unit consisting of 16 single cells with 24 cameras being monitored at the Officers post desk. There are also 3 separate non-contact Professional visiting booths. All 3 booths have a camera mounted inside the visitor side of the room. The PREA information was posted next to the Booking Desk. There is a Body Scanner located in the Intake area situated in a private room. This scanner is operated by trained personnel certified in the use of this equipment. Everyone that is committed to the jail will be body scanned. The strip search areas are 2 identical bathrooms with a shower area. All strip searches are conducted with two officers. During the tour the auditor observed an officer doing a check and announcing her presence before looking in on the inmates. The initial PREA information is provided to the inmates by way of the Inmate Handbook. Inmates are given this handbook at the initial booking process. The CVRJ has the handbook in both English and Spanish versions.

#### Southside:

Consists of 7 housing units. G, H, I, J, K, Medical, Special Housing Unit (SHU)

#### G Block:

A multiple occupancy cell-housing unit. The PREA information was posted high on the outside wall. No Audit Notice was present. The auditor asked an inmate housed in the block if he recalled seeing the notice and the inmate responded that he had and that someone (inmate) had torn the notice down. There are no cameras located in this block. However, there is an officer located on an elevated position providing constant observation. There is also an officer that roams in and out of the block twice an hour. There is a phone bank containing 3 phones located on the perimeter wall. This block can house 28 inmates. The showers are covered with shower curtains to provide privacy for the inmates.

#### H Block:

Is a multiple occupancy cell-housing unit. The PREA information was posted, as was the Audit Notice. There are no cameras located in this block, however, there is an officer located in an elevated position providing constant observation. There is also an officer that roams in and out of the block twice an hour. There is a phone bank containing 3 phones located on the perimeter wall. This block can house 25 inmates. The showers are covered with shower curtains to provide privacy for the inmates.

#### I Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and a phone bank containing 7 phones is located on the outside wall. There is a control booth positioned between I Block and J Block that is manned by two officers. There is also an officer that roams between the units. This housing unit can house 72 inmates. The shower stalls have curtains and the toilets are located behind a half wall.

#### J Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and a phone bank containing 4 phones is located on the outside wall. There is a control booth positioned between I Block and J Block that is manned by two officers. There is also an officer that roams between the units. This housing unit can house 48 inmates. The shower stalls have curtains and the toilets are located behind a half wall. The auditor engaged in a general discussion with an inmate who stated that he knew of two ways to report a sexual abuse allegation. One way was by notifying staff and the other was by calling the hotline. He also confirmed watching the PREA training video during his classification process.

#### K Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and a phone bank containing 6 phones is located on the outside wall. There is a control booth operator and an officer that roams between the units. This housing unit can house 51 inmates and the shower stalls have curtains and the toilets are located behind a half wall.

SHU:

Is a single cell-housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit in a diagonal fashion. There are 4 rolling phones stationed in this unit. There are 2 showers with secure metal shower doors and a handcuff slot cut into the middle of it. Toilets are inside the cells. One officer is stationed inside the unit in a direct supervision method with 16 inmates. The auditor checked the logbook for the presence of random checks being made by supervisors.

Medical:

The medical office consisted of a reception area and 3 exam rooms. One exam room was being occupied by a Dentist Chair. The exam rooms are open in the front but can provide privacy by pulling a ceiling to floor curtain. There is also a mental health evaluation room along with 5 single cell-housing units. Cameras are located inside the cell and the toilet area is blacked out. In addition, there are two zero pressure cells located on the opposite side of the hallway across from the single cells. A rolling phone is used in this area and the PREA information and Audit Notice was present. The auditor checked the logbook for the presence of random checks being made by supervisors.

Eastside:

Consists of L, M, N, O, FLEX, and (a) and kitchen.

L Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and placed in each corner of the block. A phone bank containing 6 phones is located on the outside wall. There is an officer stationed inside the unit with one officer roaming. This housing unit can house 37 inmates. The shower stalls have curtains and the toilets are located behind a half wall for privacy.

M Block:

Is a female unit configured in an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and placed in each corner of the block. A phone bank containing 4 phones is located on the outside wall. There is an officer stationed inside the unit with one officer roaming. This housing unit can house 38 inmates. The shower stalls have curtains and the toilets are located behind a half wall for privacy. The PREA Manager announced that a male was on the floor prior to the auditor and staff entering the unit.

N Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and placed in each corner of the block. A phone bank containing 4 phones is located on the outside wall. There is an officer stationed inside the unit with one officer roaming. This housing unit has 19 inmates housed in this unit. The shower stalls have curtains and the toilets are located behind a half wall for privacy.

O Block:

Is an open bay dorm-style housing unit. The PREA information was posted, as was the Audit Notice. Cameras are located inside the unit and placed in each corner of the block. A phone bank containing 3 phones is located on the outside wall. There is an officer stationed inside the unit with one officer roaming. This housing unit has 35 inmates housed in this unit. The shower stalls have curtains and the toilets are located behind a half wall for privacy. The auditor engaged in a general discussion with an inmate housed in O block. When asked the ways to report a sexual abuse allegation, the inmate offered

three ways. He stated that you could notify a supervisor, call the PREA hotline, or have a third party report it for you.

#### FLEX:

Is a female segregation unit configured in a single cell-housing unit? The PREA information was posted, as was the Audit Notice. Cameras are placed in each corridor. Rolling phones are used in this unit and magnets the length of the window is used on the cell doors. An announcement was made notifying the female inmates that a male was entering the housing unit. The auditor also reviewed the logbook for documentation of unannounced rounds being made by supervisory staff. This segregation unit can house 10 female inmates and is supervised by one roaming officer. The showers are in the corridor and are enclosed by a six-foot shower curtain.

#### Laundry:

The laundry room is operated by two trustees. The area is mostly closed off with one entrance and exit and two closets that always stay locked unless an officer opens them for supplies. There is camera coverage inside the laundry room but no officer supervision. The auditor asked the trustee working if he knew how to report a sexual assault. The trustee stated that he could verbally report to anyone or write a request form. The trustee also recalled watching the PREA video during his classification interview.

#### Warehouse:

The CVRJ warehouse is detached from the facility and is located on the jail grounds. The building stores confinement supplies and maintenance equipment. There is also a tool room located inside the warehouse that is caged off with fencing and locked. There are no cameras inside the warehouse however, there are multiple cameras stationed on the outside of the building. The building is mostly open with large shelving areas to store goods. There are two staff office spaces located inside the building. The warehouse is not manned at all times and during this site review no staff or inmates were present at the warehouse.

#### Front Entrance: (Reception Area)

The CVRJ front entrance is an open concept waiting area with stationary setting along the walls. There is a male and female restroom located in the vestibule. Located opposite the entrance doors are two teller style secure windows to communicate with the public. One window is used for visitation purposes and the other window is a reception station to interact with the public. The area has multiple messaging boards mounted on the walls. The PREA information, Audit Notice, and Third-Party reporting procedures were posted on these boards.

#### Personal Visiting Area:

The personal visiting area is a non-contact window-viewing concept. The visitation area is in a centralized area of the facility where it can easily funnel inmates to the area. The PREA information and Audit Notice was posted on the visitor side of the visitation area.

#### Food Service / Kitchen:

The CVRJ has a large newly built state of the art kitchen. The kitchen has an open bay concept with one walk-in cooler and two walk-in freezers. These refrigeration coolers can also be accessed from the front and back. There is a secure door that leads to a loading dock where supplies are replenished, and trash is emptied. As you access the loading dock you can enter a dry goods storage area located behind the walk-in freezers. This is also how staff can access the rear of the coolers to restock without opening the entrance doors that face inside kitchen area. The dish room is located on inside the kitchen area stationed on an outside wall, but in clear view of everything within the kitchen area. Also located in the kitchen is a dining area for the inmates. This area consists of a T.V., a telephone to make calls, and a restroom to use. This area has is partitioned off with a small knee wall and a glass structure. A tool room is situated inside the Officer's office. The tools are caged off and secure. In addition, there is a large office area for the civilian staff that contains several offices, a workstation, and their own restroom. There is camera coverage throughout the kitchen area and approximately 7 to 8 trustee inmates working at any

given time. These trustees are supervised by 1 officer and 4 fulltime civilian employees.

# AUDIT FINDINGS

**Summary of Audit Findings:**  
The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance. Auditor Note: No standard should be found to be “Not Applicable” or “NA”. A compliance determination must be made for each standard.

<b>Number of standards exceeded:</b>	1
<b>Number of standards met:</b>	44
<b>Number of standards not met:</b>	0

After reviewing all information provided during the pre-audit and onsite audit, including, staff and inmate interviews, the auditor has determined the following for the Central Virginia Regional Jail:

Exceeds Standards: 1  
Meets Standards: 44  
Does Not Meet Standards: 0

- 115.11 Meets Standards
- 115.12 Meets Standards
- 115.13 Meets Standards
- 115.14 Meets Standards
- 115.15 Meets Standards
- 115.16 Meets Standards
- 115.17 Meets Standards
- 115.18 Meets Standards
- 115.21 Meets Standards
- 115.22 Meets Standards
- 115.31 Exceeds Standards
- 115.32 Meets Standards
- 115.33 Meets Standards
- 115.34 Meets Standards
- 115.35 Meets Standards
- 115.41 Meets Standards
- 115.42 Meets Standards
- 115.43 Meets Standards
- 115.51 Meets Standards
- 115.52 Meets Standards
- 115.53 Meets Standards
- 115.54 Meets Standards
- 115.61 Meets Standards
- 115.62 Meets Standards
- 115.63 Meets Standards
- 115.64 Meets Standards

115.65 Meets Standards  
115.66 Meets Standards  
115.67 Meets Standards  
115.68 Meets Standards  
115.71 Meets Standards  
115.72 Meets Standards  
115.73 Meets Standards  
115.76 Meets Standards  
115.77 Meets Standards  
115.78 Meets Standards  
115.81 Meets Standards  
115.82 Meets Standards  
115.83 Meets Standards  
115.86 Meets Standards  
115.87 Meets Standards  
115.88 Meets Standards  
115.89 Meets Standards  
115.401 Meets Standards  
115.403 Meets Standards

This audit did not require a corrective action period.

## 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	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire</li> <li>b) CVRJ PREA Prevention Policy R-1.02. Page 1, section II, A-1: states that the CVRJ written policy mandates a zero-tolerance policy toward all forms of sexual abuse and sexual harassment.</li> <li>c) CVRJ PREA Prevention Policy R-1.02, Pages 1-4</li> <li>d) CVRJ PREA Definitions Policy R-1.01</li> <li>e) CVRJ PREA Investigations Policy, pages 4-5</li> <li>f) CVRJ PREA Organizational Chart</li> <li>g) CVRJ Captain/Chief of Security Job Description</li> <li>h) CVRJ 1st Lieutenant Standards and Compliance Job Description</li> <li>i) Interview with Specialized Staff (PREA Coordinator)</li> <li>j) Interview with Specialized Staff (PREA Compliance Manager)</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.11 Provision (a)</p> <p>The agency has provided a written policy (R-1.02) that states that the CVRJ mandates a zero-tolerance policy toward all forms of sexual abuse and sexual harassment. This policy also outlines how it will implement the CVRJ's approach to preventing, detecting, and responding to sexual abuse and sexual harassment, (.) such as; employing a PREA Coordinator and Compliance Manager with enough time and authority to oversee the jails efforts to comply with PREA standards. To make best efforts to comply with agency staffing plan and to have supervisors conduct unannounced rounds among many other strategies. In addition, the definitions associated with prohibited behaviors are also present in this agency policy. For example; the definition of sexual abuse, sexual harassment, and voyeurism. The policy also addresses sanctions for those who violate the PREA policy with discipline up to and including termination. Finally, the CVRJ PREA Policy in its entirety incorporates the necessary fundamentals needed to describe CVRJ's approach to detecting, preventing and responding to allegations of sexual abuse and sexual harassment.</p> <p>The evidence collected for this provision shows that the agency has a written policy mandating zero tolerance towards all forms of sexual abuse. The policy also outlines the agency's approach to detecting, preventing and responding to sexual abuse. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.11 Provision (b)</p> <p>The CVRJ provided an organizational chart that I reviewed. I observed that both the PREA Coordinator in the rank of Captain and the PREA Compliance Manager in the rank of Lieutenant fall directly under the supervision and control of the Deputy Superintendent of the facility. Thus, providing upper level management positions to develop and implement oversight</p>

for the facility's compliance with PREA standards.

An interview was conducted with CVRJ's PREA Coordinator, and he was asked whether he felt like he had enough time to manage all his PREA related responsibilities. The PREA Coordinator stated that he did have sufficient time and that the facility was more than accommodating to his needs and time to coordinate PREA related standards.

An interview was also conducted with the PREA Compliance Manager and he too was asked if he felt like he had enough time to manage all his PREA related duties. The Compliance Manager responded by stating that even though he has a lot of responsibilities on his plate, he did feel that he is given appropriate time to dedicate to his PREA duties.

The evidence collected for this provision shows that the agency has demonstrated that they employ an upper level PREA Coordinator and Compliance Manager with enough time and authority to develop, implement, and oversee agency efforts to comply with PREA standards. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision

115.11 Provision (c)

The CVRJ is a Regional Jail and only operates a single facility. Therefore, this provision is not applicable.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have a written policy mandating zero tolerance towards all forms of sexual abuse and sexual harassment and to employ an agency PREA Coordinator.

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>  The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard: Superintendent Memo sent on 10/10/2019 referencing standard 115.12 Provision (a) The CVRJ does not contract with any entities to provide confinement for its inmates. The superintendent's memo sent on 10/10/2019 states that "the CVRJ does not contract with other facilities to house inmates for confinement. Therefore, this standard is not applicable to this facility." Conclusion: Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard because the standard is not applicable to this agency.

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents</p> <ol style="list-style-type: none"> <li>a) Staffing Plan &amp; Development Document</li> <li>b) CVRJ Policy I-1.31 Taser Axon Body Camera Video/Audio Recording Device</li> <li>c) 2016, 2017, 2018 Staffing Plan Reviews</li> <li>d) Agency PREA Policy Prevention R-1.02</li> <li>e) Logbook entries from Daywork and Nightshift</li> <li>f) CVRJ Activity Logs</li> <li>g) Observations during on-site review of physical plant</li> </ol> <ol style="list-style-type: none"> <li>1. Interview with Warden or designee</li> <li>2. Interview with PREA Coordinator and Compliance Manager</li> <li>3. Interview with Intermediate or higher-level Facility Staff</li> </ol> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.13 Provision (a)</p> <p>CVRJ Policy R-1.02 states the agency shall ensure that the facility develops, documents, and makes its best effort to comply on a regular basis with a staffing plan as found in policy PREA Prevention R-1.02 page 1, paragraph II section 4 and 5 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, the facility shall take into consideration:</p> <ol style="list-style-type: none"> <li>a) Generally accepted detention and correctional practices;</li> <li>b) Any judicial findings of inadequacy;</li> <li>c) Any findings of inadequacy from Federal investigative agencies;</li> <li>d) Any findings of inadequacy from internal or external oversight bodies;</li> <li>e) All components of the facility's physical plant (including blind spots);</li> <li>f) The composition of inmate population;</li> <li>g) The number and placement of supervisory staff;</li> <li>h) Institution programs occurring on a particular shift;</li> <li>i) Any applicable State or local laws, regulations, or standards;</li> <li>j) The prevalence of substantiated incidents of sexual abuse; and</li> <li>k) Any other relevant factors.</li> </ol> <p>Observations made during the On-Site Audit and Document Review</p> <p>Since the last PREA audit, the average daily population of inmates at the CVRJ was 422 and the current staffing plan was predicated on 442 inmates housed at the CVRJ.</p> <p>During the interview with the Warden / Designee he was asked if the facility had a staffing plan and if the staffing levels to protect inmates from sexual abuse was considered in the plan, if video monitoring is part of this plan, and if the staffing plan is documented. The Warden/Designee confirmed yes to all the above questions. The Warden/Designee also confirmed that when reviewing the staffing plan on an annual basis they consider all the above</p>

matters. Finally, the Warden/Designee explained that if the daily staffing plan is not met, overtime is used to backfill positions. The auditor also interviewed the PREA Compliance Manager and asked if the above considerations are weighed when developing the staffing plan. The Compliance Manager explained that the staffing plan is based from Virginia Department of Corrections and PREA standards. The staffing plan is developed on 14 security posts. They use body cameras every day with all security officers working security posts. The Compliance Manager also advised that the facility added additional camera coverage during the new and ongoing renovations at the jail. The CVRJ also looks at surrounding jurisdictions lawsuits.

The evidence collected for this provision shows that the agency has a written policy that addresses appropriate staffing plans and reviews. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.13 Provision (b)

CVRJ PREA Prevention policy R-1.02 documents that when the staffing plan is not met, these situations must be documented and justified. During the interview with the Warden/Designee he was asked if the agency documents all instances of non-compliance with the staffing plan. The Warden/Designee stated that yes, it is documented and the explanation for not meeting the plan must be justified”.

The evidence collected for this provision shows that the agency has a written policy that addresses documenting situations where staffing plans are not met. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Provision C:

CVRJ PREA Prevention policy R-1.02, paragraph II, section 5 states that; Whenever necessary, but no less frequently than once each year, the PREA Coordinator and PREA Compliance Manager shall assess, determine, and document whether adjustments are needed to:

- The staffing plan;
- The deployment of monitoring technology; or
- The allocation of agency resources to commit to the staffing plan to ensure compliance

During the PREA Coordinator interview the coordinator was asked if he is consulted regarding any assessments or adjustments to the staffing plan. The Coordinator stated that the staffing plan is reviewed yearly and that the PREA Coordinator takes part in those meetings. The CVRJ also provided meeting notes from the last three annual Staffing Plan Reviews.

The evidence collected for this provision shows that the agency has a written policy that addresses performing annual staffing plan reviews. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.13 Provision (d)

CVRJ PREA Prevention policy R-1.02, page 2, paragraph B, sections 1-2 state that supervisors will conduct unannounced rounds on a daily basis to deter staff sexual abuse. In addition, the policy states that staff is prohibited from alerting other staff members when these unannounced rounds are being conducted. Any violations would result in disciplinary actions. The CVRJ provided 15 samples of logbook pages identifying and documenting unannounced rounds by supervisors across all shifts at different times of the tour of duty. The auditor

reviewed multiple logbooks stationed on all security posts during the site review tour confirming that these unannounced rounds are being conducted.

During the interview process, the auditor interviewed an intermediate or higher-level supervisory staff about unannounced rounds. The supervisor was asked if he conducted unannounced rounds and if he documented those rounds. The supervisor stated that yes, he performs unannounced rounds and that they are documented on post logbooks. When asked how the supervisor would prevent staff from alerting other staff members about unannounced rounds. The supervisor responded that he did them randomly and unannounced.

The evidence collected for this provision shows that the agency has a written policy that addresses performing unannounced rounds. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion:  
Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have supervision and monitoring.

<b>115.14</b>	<b>Youthful inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <ul style="list-style-type: none"> <li>• Superintendent Memo sent on 10/10/2019 referencing standard 115.14 provision a, b, and c</li> </ul> <p>The Superintendent's memo sent on 10/10/2019 states that "the CVRJ does not house juvenile inmates. During the on-site review of the physical plant the Auditor did not witness any youthful inmates after conducting 58 interviews with staff and inmates there was no evidence to suggest the CVRJ houses youthful inmates Therefore, this standard is not applicable to this facility.</p> <p>Conclusion: Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard because the standard is not applicable to this agency.</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA CVRJ Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <ul style="list-style-type: none"> <li>(a) Agency PREA Policy Prevention R-1.02- page 2, paragraph</li> <li>(b) CVRJ Agency PREA Policy Prevention R-1.02- page 2 paragraphs 3-5</li> <li>(c) CVRJ Agency PREA Policy Prevention R-1.02-page 2 paragraph 5</li> <li>(d) CVRJ Agency PREA Policy Prevention R-1.02- page paragraphs 6-7</li> <li>(e) CVRJ Agency PREA Policy Prevention R-1.02- page 2 paragraph 8</li> <li>(f) CVRJ PREA Training Curricula</li> <li>(g) CVRJ Staff Training Logs</li> <li>(h) CVRJ Staff Training Power Point</li> <li>(i) 12 interviews with Random Staff</li> <li>(j) 13 interviews with Random Inmates</li> <li>(k) Interview with Non-medical staff involved with strip searches</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.15 Provision (a)</p> <p>CVRJ is a Regional Jail that houses both male and female inmates. Agency policy states that “Central Virginia Regional Jail Security Staff will not conduct cross-gender strip searches, cross-gender pat searches, or cross-gender visual body cavity searches (anal or genital opening)There are no examples of exigent circumstances because it’s against policy and no incidents have occurred. When conducting the on-site review of the facility the auditor observed adequate female staff to accommodate any day-to-day operations involving gender specific searches. When interviewing the non-medical staff responsible for conducting strip searches, the officer was asked under what circumstance would it require a cross-gender strip search. The officer replied that he could not think of any circumstance that would constitute the need to cross gender strip searches an inmate.</p> <p>The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances when performed by medical practitioners. The interview with non-medical staff that conducts strip searches confirmed the practice during the interview. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.15 Provision (b)</p> <p>The CVRJ agency policy states that “Central Virginia Regional Jail Security Staff will not conduct cross-gender strip searches, cross-gender pat searches, or cross-gender visual body cavity searches. There are no examples of exigent circumstances because it’s against policy and no incidents have occurred. When conducting the on-site review of the facility the auditor observed adequate female staff to accommodate any day to day operations involving gender specific pat searches.</p> <p>During the on-site phase the auditor interviewed 12 random staff members from both day and night shifts. When asked if female staff are not available to search female inmates, does the jail limit those inmates’ access to programs. 10 officers stated that it had never occurred, and</p>

the supervisory staff would ensure if the shift was short female officers then a female officer would be called in to cover that shift. 2 officers stated that medical personnel would utilize the body scanner in these situations. In addition, 13 random inmates were interviewed during the on-site phase of the audit. Out of those 13 random inmates, (3 of them were female). When asked by the auditor if they had ever been unable to participate in activities outside their cell because of the lack of female officers to perform pat searches, all 3 stated no.

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender pat searches, except in exigent circumstances when performed by medical practitioners. The interviews conducted with staff and female inmates confirmed there have not been incidents where female inmates have been limited to activities due to the shortage of female officers. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.15 Provision (c)

The CVRJ agency policy states that “any cross-gender searches conducted in exigent circumstances are done by Medical personnel and documented. There were no examples of these situations over the last twelve months.

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender pat searches, except in exigent circumstances when performed by medical practitioners. Therefore, through written policy, the agency has demonstrated that it meets this provision.

#### 115.15 Provision (d)

The CVRJ agency policy states that “inmates will 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 in incidental routine cell checks. The agency policy also addresses when staff must announce their presence when entering a housing unit of the opposite gender. The CVRJ policy states that Staff will announce “Male on the Floor” or “Female on the Floor” (anytime the opposite gender enters an Inmate Housing Unit. In addition, when conducting the site review the auditor observed half wall partitions separating toilets from view, full length shower curtains or half doors for privacy when showering and blacked out areas on monitoring screens so staff could not view inmates when using the restrooms or showers. The auditor also witnesses officers announce their presence when entering a housing block of inmates of the opposite sex.

During the on-site phase, the auditor interviewed both random staff and inmates. The 12 random staff were asked if they or other officers announce their presence when entering a housing unit of inmates of the opposite sex. All 12 officers stated that they do. When asked if inmates can dress, shower, and use the restroom without being viewed by officers of the opposite sex, all 12 officers stated yes they could. The auditor also interviewed 13 random inmates. When asked if male/female officers announce their presence when entering the housing block of the opposite sex, all 13 inmates stated yes, they do. When asked if they or other inmates are ever naked in full view of male/female officers, all 13 inmates stated no they are not.

The evidence collected for this provision shows that the agency has a written policy that enables inmates to shower, perform bodily functions, and change clothes without being viewed by staff of the opposite sex. They also have a policy that require all staff to announce their presence when entering a housing unit of inmates of the opposite sex. The interviews

conducted with random staff and random inmates confirmed that these policies are being practiced by staff. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

115.15 Provision (e)

The CVRJ agency policy states that “staff” will not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. If the genital status is unknown, it may be determined during conversations with the inmate, reviewing medical records, or as part of a broader medical examination conducted in private by Medical Staff. During the site review the auditor was shown a body scanner and were provided the instructions and policy on using the Body Scanner. All inmates brought to the CVRJ are run through the body scanner with the exception of those inmates who are pregnant or have medical conditions.

When interviewing random staff, they were asked if they were aware of the agency policy prohibiting staff from searching or physically examining a transgender person for the sole purpose of determining the inmate’s genital status. All 12 random officers stated that yes they are aware. However, they also stated genital status can be determined by the body scanner results. At the time of this audit the CVRJ informed the auditor that there were no transgender inmates housed in their facility.

115.15 Provision (f)

The CVRJ does not conduct cross-gender pat searches. The agency provided training records and training curricula as proof of receiving training on cross-gender pat searches and searches of transgender and intersex inmates in a professional manner. During the on-site review the auditor interviewed 12 random staff in those interviews the officers were asked if they had received training on how to conduct a cross-gender pat search and when did they receive the training. All 12 stated that they had received the training. However, they stated that the facility prohibits the practice. 5 officers stated that they received the training at the academy and 6 stated that they receive the training annually. 1 officer stated that he had received the training last week.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency to have limits to cross-gender viewing and searches.

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <ul style="list-style-type: none"> <li>a) CVRJ PREA Prevention Policy R-1.02</li> <li>b) TTY VRI Device</li> <li>c) PREA Poster in both English &amp; Spanish</li> <li>d) VRI Contract with Interpreting Services</li> <li>e) Limited English Translator</li> <li>f) PREA Training Outline</li> <li>g) Inmate Handbook in both English &amp; Spanish</li> <li>h) PREA Inmate Acknowledgement in both English &amp; Spanish</li> <li>i) Inmate PREA training video in both English &amp; Spanish</li> </ul> <p>Provision A:</p> <p>The CVRJ PREA Prevention policy R-1.02 page 3, paragraph C, sections 1-3 states in part that; the Central Virginia Regional Jail shall take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all efforts to prevent, detect, and respond to sexual abuse and sexual harassment. All inmate education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Formats include, but not limited to: interpreters for the deaf or hard (of) hearing, reading the material to visual impaired, and providing interpreters services for non-English speaking inmates. Finally, the CVRJ has created a document that records an inmate has received and understands the PREA information by signature. Some of the PREA information provided is; ways to report a sexual assault, contacting an advocate, and the right to be free from all types of sexual abuse or sexual harassment.</p> <p>The agency has provided documentation of a contract between Civic Access and CVRJ to provide interpreting services. The CVRJ provides an Inmate PREA training video in English and Spanish and has a TTY device / video interpreting available for those inmates who are deaf or (have) limited hearing. During the site review the auditor observed the PREA Posters located in all housing units in both English and Spanish. I Sat through a classification interview, which included the reviewing a PREA Inmate training video.</p> <p>The Agency Head / Designee was interviewed and asked if his agency has established procedures to provide inmates with disabilities and inmates who are limited English can participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Agency Head/Designee stated that; Yes, his agency has two ADA Certified Coordinators and that staff has been certified language interpreters. In addition, 4 inmates identified as disabled or limited proficient in English were interviewed during the on-site review phase. The inmates were asked if the facility provided information about sexual abuse that they were able to understand, and if not, did the facility provide someone to help, write, read, or explain. Finally, did the inmate understand the information that was provided .All 4 stated yes to these questions; explaining that they received the information in Spanish, provided a handbook, PREA Posters on the walls and the use of staff interpreters.</p> <p>The evidence collected for this provision shows that the agency has a written policy that addresses that the agency takes appropriate steps to ensure that inmates with disabilities</p>

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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.16 Provision (b)

The CVRJ PREA Prevention policy R-1.02 page 3, paragraph C, sections 1-3 states in part that; the Central Virginia Regional Jail shall take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all efforts to prevent, detect, and respond to sexual abuse and sexual harassment. All inmate education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. Formats include, but not limited to: interpreters for the deaf or hard of hearing, reading the material to visual impaired, and providing interpreters services for non-English speaking inmates. Finally, the CVRJ has created a document in both English and Spanish that records an inmate has received and understands the PREA information by signature. Some of the PREA information provided is; ways to report a sexual assault, contacting an advocate, and the right to be free from all types of sexual abuse or sexual harassment.

The agency has provided documentation of a contract between Civic Access and CVRJ to provide interpreting services. The CVRJ provides an Inmate PREA training video in English and Spanish During the site review the auditor observed the PREA Posters located in all housing units in both English and Spanish. Sat through a classification interview, which included the reviewing a PREA Inmate training video which is also in both English and Spanish. In addition, the agency has certified staff that are considered proficient in a particular language and authorized to interpret.

During the interview process 4 inmates identified as disabled or limited proficient in English were interviewed during the on-site review phase. The inmates were asked if the facility provided information about sexual abuse that they were able to understand and if not did the facility provide someone to help, write, read, or explain. Finally, did the inmate understand the information that was provided. Only 1 inmate was considered "limited English proficient ". He stated yes to these questions explaining that he received the information in Spanish, provided a handbook in Spanish, PREA Posters in Spanish on the walls and had witnessed the use of staff interpreters.

The evidence collected for this provision shows that the agency has a written policy that addresses that the agency takes appropriate steps to ensure that inmates who are " limited English proficient " 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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.16 Provision (c)

The CVRJ PREA Prevention policy R-1.02 page 3, paragraph C, sections 1-3 states in part that the jail shall not rely on inmate interpreters except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties, or the investigation of the inmate's allegations. During the audit interview process the auditor asked 12 random staff if the agency ever allows the use of inmate interpreters. 11 random staff stated that they would not use inmate interpreters. In addition, those same 11 random staff members stated that they would use staff interpreters with 4 staff members also identifying the language line as an additional

option. The final staff member stated the he/she would use an inmate interpreter. The evidence collected for this provision shows that the agency has a written policy that addresses that the agency shall not rely on inmate interpreters. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

**Conclusion:**

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard referencing requirements for inmates with disabilities and inmates who are limited English proficient have equal opportunity or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

115.17	<b>Hiring and promotion decisions</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Prevention policy R-1.02</li> <li>b) Virginia Criminal Information Network (VCIN) logbook</li> <li>c) Memorandum stating the CVRJ's process of running Criminal Histories on staff</li> <li>d) Examples of Pre-hire Officer Interview Questions</li> <li>e) Staff Employee Files</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Human Resources Staff</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.17 Provision (a)</p> <p>1. CVRJ Prevention policy R-1.02, page 3, section D states in part; Central Virginia Regional Jail will not hire or promote anyone or enlist the services of any contractor, who may have contact with inmates, that:</p> <ul style="list-style-type: none"> <li>a. Have engaged in sexual abuse in a prison, jail, lockup, or community confinement facility or juvenile facility.</li> <li>b. Have been convicted of engaging or attempting to engage in sexual activity by overt or implied threats of force, coercion, or if the victim did not consent or was unable to consent or refuse.</li> <li>c. Have been civilly or administratively adjudicated to have engaged in sexual activity.</li> </ul> <p>During the file review part of this audit 13 personnel files were sampled. This sample included civilian staff, volunteers, contractors, and security staff. The review resulted in 12 files indicating an initial criminal history being ran. One file contained no evidence. In addition, 2 files had evidence that pre-hire interview questions regarding past conduct were asked and answered. The reason for the limited documentation for the interview questions is due to the policy being newly initiated after the last PREA audit in 2017. Also, during the facility review tour the auditor observed the VCIN logbook located next to the terminal.</p> <p>The evidence collected for this provision shows that the agency has a policy prohibiting the hiring or promoting anyone who may have contact with inmates, if they had engaged in sexual abuse in jail. If convicted of engaging or attempting to engage in sexual abuse and had been civilly adjudicated due to engaging in these activities. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.17 Provision (b)</p> <p>CVRJ Prevention policy R-1.02, page 3, section 1, paragraph D states in part; The Jail shall consider any incidents of sexual harassment in determining whether to hire, promote, or enlist services. During the audit interview process the Human Resources staff member was asked if</p>

the agency considers prior incidents of sexual harassment when determining whether to hire or promote anyone and to enlist services of any contractors. The H.R. staff member stated that they do consider those prior incidents and red flags the file. The H.R. staff member stated that she would confide in the Superintendent for a recommendation.

The evidence collected for this provision shows that the agency has a policy requiring the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

115.17 Provision (c)

CVRJ Prevention policy R-1.02, page 4, section D, paragraphs 2 and 5 in part states; a criminal background records check will be conducted before hiring new employees or enlisting services from volunteers or contractors who may have contact with inmates. Paragraph 5 states; consistent with Federal, State, and Local Laws, CVRJ will 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. During the audit interview process the H.R. staff member was asked if the facility performs criminal record background checks for all newly hired employees, considered for promotion, and any contractor that may have contact with inmates. The H.R. staff member stated that; She performs a criminal record check on all new hires, volunteers, contractors and current employees on an annual basis. The auditor reviewed 13 personnel files. The auditor determined that 12 files had proof of a criminal record check. One file did not have any documentation. Also, during the facility review tour the auditor observed the VCIN logbook located next to the terminal. In addition, the facility provided documentation of the VCIN logbook with employee's names being run.

The evidence collected for this provision shows that the agency has a policy requiring that criminal records be run on all new employees. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

115.17 Provision (d)

CVRJ Prevention policy R-1.02, page 4, section D, paragraphs 2 and 5 states in part; a criminal background records check will be conducted before hiring new employees or enlisting services from volunteers or contractors who may have contact with inmates. Paragraph 5 states; consistent with Federal, State, and Local Laws, CVRJ will 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. During the audit interview process the H.R. staff member was asked if the facility performs criminal record background checks for all newly hired employees, considered for promotion, and any contractor that may have contact with inmates. The H.R. staff member stated that; She performs a criminal record check on all new hires, volunteers, contractors and current employees on an annual basis. The auditor reviewed 13 personnel files. The auditor determined that 12 files had proof of a criminal record check. One file did not have any documentation. Of those 12 files, one file was a contractor. Also, during the facility review tour the auditor observed the VCIN logbook located next to the terminal. In addition, the facility provided documentation of the VCIN logbook with employee's names being run.

The evidence collected for this provision shows that the agency has a policy requiring that

criminal records be run on all new contractors that have contact with inmates. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (e)

CVRJ Prevention policy R-1.02, page 4, section D, paragraph 3 states in part; criminal background records check will be conducted on all current employees, volunteers, contractors, who may have contact with inmates at least every five (5) years. The H.R. staff member was interviewed and asked what system is used to conduct criminal record checks on staff. The H.R. staff member stated that; the agency uses the VCIN system and if an FBI number is revealed during the history query that number is ran to determine if a criminal history exists outside the state of Virginia. When reviewing the 13 personnel files 11 files indicated a five year follow up criminal records check.

The evidence collected for this provision shows that the agency has a policy requiring that criminal records check be run on all employees, contractors, and volunteers at least every five years. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (f)

CVRJ Prevention policy R-1.02, page 4, section D, paragraph 4 states in part; all applicants and employees, who may have contact with inmates, will be asked directly about previous misconduct in all written applications, interviews for hiring or promotion, or during written evaluations. During the interview with the H.R. staff member, it was asked if the facility ask all applicants and employees about previous conduct does the facility impose upon employees a continuing affirmative duty to disclose previous misconduct. The H.R. staff member stated that the agency has a list of questions and questions that are asked and written down by the interviewer. She also stated that yes, all employees must report any misconduct or interaction with law enforcement to include traffic summons. The agency provided copies of questions and answers given to staff.

The evidence collected for this provision shows that the agency has a policy requiring that they ask about previous misconduct and the employee's responsibility to disclose such misconduct. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.17 Provision (g)

CVRJ Prevention policy R-1.02-page 4 section D, paragraph 6 states in part; employees must disclose any such misconduct. Any material omission or false information regarding misconduct will be grounds for termination. There are no examples or circumstances over the last twelve months to provide documentation for this provision.

The evidence collected for this provision shows that the agency has a policy requiring that material omissions regarding such misconduct or the provision of materially false information are grounds for termination. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### 115.17 Provision (h)

CVRJ Prevention policy R-1.02-page 4 section D, paragraph 7 states in part; that CVRJ will 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, unless prohibited by law. The H.R. staff member was asked during the interview, if a former employee applies for work at another institution and a request by that institution is made does the agency provide information on substantiated

allegations of sexual abuse or sexual harassment involving that former employee. The H.R. staff member stated that this type of situation would not involve her, and she doesn't handle those situations. She also stated that she is not aware of any situation that would meet this scenario in the last twelve months.

The evidence collected for this provision shows that the agency has a policy requiring that unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse and sexual harassment involving former employee upon receiving a request from an institutional employer for whom the employee has applied to work. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

**Conclusion:**

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring hiring and promotional decisions.

115.18	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Prevention policy R-1.02</li> <li>b) Taser Axon Body Camera Wearable Video/Audio Recording Device</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.18 Provision (a)</p> <p>The CVRJ Prevention policy R-1.02 page 5, paragraph E, section 1 states that; the CVRJ will consider the Jail’s ability to protect inmates from sexual abuse during any planned expansions, modifications, or video equipment updates to the Jail. However, the agency has not acquired a new facility or made a substantial expansion to existing facility since the last PREA audit in 2017.</p> <p>During the audit interview phase the Agency Head / Designee was asked that when planning substantial modifications to the facility, “how does the agency consider such changes on its ability to protect inmates from sexual abuse?” The Agency Head stated, “They look for possible blind spots.” In addition, the Warden/Designee was also asked the same question. The Warden / Designee stated, “The current renovations are adding cameras to address both PREA and mental health considerations. “ The auditor observed the renovations underway when performing the site review tour. At the time of the on-site audit phase these housing blocks were still under construction and not being occupied.</p> <p>The evidence collected for this provision shows that the agency has a written policy that addresses when designing or planning any substantial modifications to the facility, the agency shall consider the effect of such design improve the ability to protect inmates from sexual abuse. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>Provision B:</p> <p>The CVRJ has provided a memorandum authored by the PREA Compliance Manager addressing the current ongoing renovation and the use of Officer Body Cameras. The memorandum states, “Facility Staff” per company policy are required to wear body cameras while in the presence of any inmate. Failure by staff to keep their cameras turned on and recording leads to disciplinary action and can lead to termination. By requiring staff to wear body cameras it has limited inmate allegations against staff and provided investigators with a vital tool for reviewing allegations that come forward. Staff sexual misconduct is easier to detect and the body cameras act as a deterrent for staff who know that all interactions with inmates are both verbally and audio recorded. During the past year the facility has had 6 PREA sexual abuse or harassment allegations from inmates claiming that officers were the aggressor. The body cameras have allowed for quick investigation of these allegations and proven that all allegations against staff were unfounded.</p> <p>The facility is currently going through a remodel of its oldest section Northside and part of Southside where it is replacing the plumbing in these housing units. These areas were the only housing units that did not have cameras inside of the blocks. Northside now has cameras</p>

in all the housing units which record audio as well as video. The two Southside housing units, G-Block and H-Block are scheduled to receive the same style DVR cameras upon completion of the Northside plumbing. These cameras help to ensure inmate safety by providing officers with multiple ways to monitor the housing units and helping to eliminate any possible blind spots that cannot be observed from the overlook booth. These cameras will also help ensure inmate safety by providing investigators with another tool to review inmate visual and verbal misconduct during reported allegations.

The auditor observed the renovations underway when performing the site review tour. At the time of the on-site audit phase these housing blocks were still under construction and not being occupied. In addition, during the audit interview phase the Agency Head was asked how the agency uses monitoring technology. The Agency Head stated, "The agency" utilizes cameras to assist in monitoring supervision, capture evidence, and block out areas for privacy concerns. The cameras can also cover blind spots that security staff may not be able to view. The Warden / Designee was also asked a similar question about how the facility had considered using technology to enhance inmates' protection from sexual abuse. The Warden/Designee stated that; the facility utilizes body cameras to assist and conduct investigations. Also, to enhance prevention, detection, and safety.

During the on-site review tour the auditor observed all security officers wearing body cameras. In addition, whenever the PREA Coordinator or PREA Compliance Manager entered the secure area, they too would attach a body camera.

The evidence collected for this provision shows that the agency has considered how technology may enhance the agency's ability to protect inmates from sexual abuse. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard addressing upgrades to facilities and technology.

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire responses</li> <li>b) CVRJ PREA Investigations Policy R-1.05</li> <li>c) Memorandum of Agreement between CVRJ and University of Virginia Medical Emergency Department (effective date 02/22/16)</li> <li>d) Memorandum of Agreement between CVRJ and Services to Abused Families (SAFE) (effective date 03/25/16)</li> <li>e) CVRJ Coordinated Response</li> <li>f) Superintendent Memo dated 10/10/19 referencing 115.21 provision (b)</li> </ul> <p>Interviews</p> <ul style="list-style-type: none"> <li>a) Interview with SANE/SAFE staff</li> <li>b) Interview with inmates who reported a sexual abuse</li> <li>c) Interview with the PREA compliance manager</li> <li>d) 12 interviews with random staff</li> </ul> <p>Observations during on-site review of physical plant.</p> <p>115.21 Provision (a)</p> <p>During the review phase of the Pre-Audit Questionnaire the auditor noticed that there was no standing MOU indicating who conducted criminal investigations. The PREA Manager was contacted and asked this question. The PREA Manager explained the Virginia State Police (VSP) conducted all criminal sexual assault investigations at the CVRJ. However, the PREA Manager has been unable to secure a MOU with the State Police due to their reluctance and did not see any progress soon. The auditor requested evidence be provided to show the good faith efforts made on the behalf of the CVRJ. On 10/04/2019 the auditor contacted the VSP Division II Bureau of Investigation to ascertain if they did in fact conduct alleged sexual assault criminal investigations at the CVRJ facility. The auditor contact information was left so that a detective to return the call. On 10/07/2019 the auditor received a phone call from a First Sergeant Detective with the VSP Division II Bureau of Investigation Unit. He informed me that they do in fact investigate all criminal sexually assault allegations and acknowledged that the only requirement needed to send an investigator is an official request from the facility. The VSP is responsible for investigating allegations of sexual crimes that occur within the CVRJ facility and is familiar with PREA standard 115.21 pertaining to the investigation of sexual assaults, the collection of evidence, and forensic examinations". Furthermore, the facility provided agency PREA Investigation policy R-1.05 page 2, section A, paragraph 10.in the PAQ that states, in part, that Any allegations of Sexual Abuse that appear criminal will be referred to Virginia State Police Bureau of Criminal Investigations for criminal investigation. The facility also provided agency PREA Investigative policy R-1.05 and the CVRJ Coordinated Response document in response to the PAQ as standard operating procedures to follow when collecting</p>

evidence in a sexual abuse incident. Agency policy R-1.05 page 1, section A, paragraph 3 states in part that; “investigators will be responsible for gathering non-clinical evidence and information relating to the alleged sexual assault”.

Security staff shall take steps to gather and/or preserve direct and circumstantial evidence, including any available physical or DNA evidence and shall follow a uniform evidence protocol outlined in the CVRJ Coordinated Response document.

When the Auditor interviewed 12 random staff it was determined that all 12 staff were aware of their responsibilities to preserve evidence during a sexual abuse allegation. They discussed securing the scene, notifying a supervisor immediately, contacting medical personnel, writing a detailed report and not allowing the victim or accuser to bathe. Also, when asked who was responsible for investigating criminal and administrative cases, 8 staff members were aware that the Virginia State Police investigates criminal cases and 4 believed it was the responsibility the CVRJ PREA Compliance Manager. All 12 staff were aware that CVRJ trained investigators investigates administrative cases. Most staff interviewed were therefore aware of the protocol for evidence collection.

The evidence reviewed for this provision shows that the agency has demonstrated that they do follow a uniform evidence protocol for obtaining physical evidence for administrative and criminal proceedings. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (b)

The facility provided a memorandum dated 10/10/2019 from CVRJ Superintendent Dyer that states that the Central Virginia Regional Jail does not house juvenile inmates. Therefore, this particular provision does not apply to this facility.

#### 115.21 Provision (c)

The facility offered the agency PREA Investigations policy R-1.05 as documentation to follow when a forensic examination is needed. Policy R-1.05 page 2, section A, paragraphs 10 and 11 states in part that “Any allegations of sexual abuse that appears criminal will be referred to the VSP Bureau of investigation for criminal investigation. In addition, the policy states that the CVRJ shall request that the VSP follow the PREA standard 115.21 (a-f). The alleged victim shall be immediately transported to UVA Hospital to be examined by a medical professional who is skilled and experienced in the use of rape kits for the collection of forensic evidence”. UVA hospital shall employ a Sexual Assault Nurse Examiner (SANE) or a Sexual Assault Forensic Examiner (SAFE). In addition, DC-ADM 008 also states that treatment services shall be provided to the alleged victim without financial costs to the victim.

The facility provided a Memorandum of Understanding (MOU) between the University of Virginia Forensic Nurse Examiners (UVA) and the CVRJ, which states in part that; “UVA is a licensed health care facility that may provide health care services to offenders housed in a state or local correctional institution. An offender who is a victim of an alleged sexual abuse may be transported to UVA Hospital for a sexual assault forensic examination. The Hospital employs one or more staff members trained in sexual assault examination”. The MOU further states that the hospital agrees that any such examination will be performed by a nurse trained in sexual assault examination under the direction of a physician or the physician him/herself

within the first 72 hours.

The PREA compliance manager replied in the Pre-Audit Questionnaire stating that the facility did not experience any sexual abuse allegation requiring a forensic examination by a SAFE/SANE nurse or physician during the last calendar year. In addition, during the interview with the PREA compliance manager, he stated that the facility did not have a situation where an inmate was referred to the hospital for a forensic examination.

Prior to the on-site audit at the CVRJ facility an interview was conducted by the auditor with a Sexual Assault Nurse Examiner (SANE). The interview was conducted by phone with the SANE Nurse Manager of the University of Virginia Hospital (UVA), located in Charlottesville Virginia. A SANE nurse is a highly skilled certified nurse trained in the art of evidence collection and chain of custody. The nurse is considered the subject matter expert in collecting evidence after an alleged sexual assault has occurred. The nurse is also required to provide testimony in court cases related to sexual abuse. The Nurse explained that she was aware of the MOU between her agency and the CVRJ facility when it comes to conducting SANE exams. She explained that UVA Hospital has current MOU's with all the surrounding confinement detention facilities to provide forensic medical exams. When asked if the UVA Hospital Forensics Unit is responsible for conducting all forensic medical exams for the CVRJ facility, the Nurse Manager stated that the UVA Hospital is the only hospital in the area that offers forensic services. When asked if SANE staff are unavailable to conduct forensic medical examinations, who assumes the responsibility? The Nurse Manager replied that her staff is available 24 hours a day, 7 days a week, 365 days a year. A SANE nurse is always made available.

The evidence collected for this provision shows that the agency has procedures in place to offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost to the victim. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (d)

The facility has provided a Memorandum of Understanding (MOU) between the Services to Abused Families (SAFE) and CVRJ dated 03/25/2016. SAFE is a victim services advocate that provides confidential support and assistance to sexual assault victims in Central Virginia. In accordance with 42. USC 14043g (b) (2) (c) the requirements to be considered a "rape crisis center" are as follows:

1. Provide a 24-hour hotline
  2. Accompaniment and advocacy through the medical, criminal justice and social support systems.
  3. Short-term crisis intervention support
  4. Information and referral to assist sexual assault victim and family
  5. Community out-reach for underserved communities
  6. The development and distribution of materials on issues related to the above listed issues.
- The auditor has reviewed the SAFE website to determine that this advocacy group does meet all the criteria listed above to be considered a "rape crisis center"

The MOU states that SAFE will maintain a trained pool of advocates to respond to sexual assault and maintain confidentiality as required by state standards for certified crisis counselors.

The PREA compliance manager was interviewed by the auditor and stated that staff would allow access to a victim advocate if the inmate requested. The PREA compliance manager also stated that the facility provides access to SAFE through a hotline advertised in every block. Finally, the one inmate interviewed during the on-site interview process that reported a sexual abuse incident within the facility, which the facility classified as unfounded after an initial investigation, stated that she was not allowed to contact anyone, and that she wanted to speak with her mother, fiancé, and sister. When interviewing this inmate, she described her allegation as a complaint against an inmate who made some sexual comments to her in a sexual manner. She felt that this was very embarrassing because it was done in front of other inmates. This allegation would not rise to the level of sexual abuse but, rather, sexual harassment, so this inmate's experience is not relevant to this provision.

During the on-site review the auditor spoke to several inmates who confirmed the availability to contact SAFE via phone. This demonstrates the facility's attempt to make available to victims of sexual abuse a victim advocate from a rape crisis center.

The evidence collected for this provision shows that the agency has demonstrated that they do offer services from a victim advocate from a rape center that is not associated with the criminal justice system or law enforcement and provides confidentiality. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.21 Provision (e)

The facility has provided the agency MOU with SAFE as a standard operating procedure addressing when a victim advocate can accompany an alleged sexual assault victim through the forensic examination and during the investigatory interview process. The MOU states in part that; "If the inmate is taken to the hospital for a forensic exam, they should be afforded the opportunity to support services provided by a victim advocate. The victim advocate shall meet the inmate at the hospital to accompany and support the alleged victim through the forensic examination".

The facility's MOU with Services to Abused Families states that SAFE will provide advocacy for and accompany the victim to the hospital or other location where a forensic examination is to be conducted.

The CVRJ PREA compliance manager stated that the facility did not experience any sexual abuse allegation requiring a forensic examination by a SAFE/SANE nurse or physician during the last calendar year. In addition, when asked how the agency ensures that the advocate meets the qualifications described above, the compliance manager stated that the service is coming from an official rape crisis center.

The evidence collected for this provision shows that the agency has demonstrated that they do allow victim advocates to accompany and support alleged victims of sexual assault during the forensic examination and during the investigatory interview. Therefore, through written policy, and interviews conducted, the agency has demonstrated that it meets this provision.

115.21 Provision (f)

The facility offered the agency PREA Investigations policy R-1.05 page 2, section A, paragraphs 10 and 11 states in part that “Any allegations of sexual abuse that appears criminal will be referred to the VSP Bureau of investigation for criminal investigation. In addition, the policy states that the CVRJ shall request that the VSP follow the PREA standard 115.21 (a-f).

The evidence collected for this provision shows that the agency has demonstrated that they have requested that the Virginia State Police follow the provisions out-lined in this provision in the current agreement between the agencies. Therefore, through written policy, and verbal agreement, the agency has demonstrated that it meets this provision.

115.21 Provision (g)

The auditor is not required to audit this provision.

115.21 Provision (h)

The auditor is not required to audit this provision

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the agency to provide evidence protocols and forensic medical evaluations.

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Investigation Policy R-1.05</li> <li>c) CVRJ Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head</li> <li>b) Interview with Investigative Staff</li> </ul> <p>Observations made during the Pre-Audit Phase of the Audit.</p> <p>115.22 Provision (a)</p> <p>CVRJ Agency PREA Investigation Policy R-1.05 section A, addresses that all administrative and criminal investigations, when warranted, are completed on all allegations of sexual abuse and sexual harassment. The facility has 10 trained Specialized Investigators. However, the PREA compliance manager performs the majority of the administrative investigations. When a sexual abuse allegation is made, an initial inquiry is conducted by a trained investigator to determine who, what, when, where, and how. If it is determined that probable cause exists that a crime may have been committed the Agency Superintendent is notified. The Agency Superintendent makes contact with the Virginia State Police and requests that a criminal investigation be initiated.</p> <p>In the past twelve months the CVRJ reported that they had received 19 allegations of sexual abuse or sexual harassment. Out of those allegations 19 administrative investigations were conducted and 3 allegations were referred for criminal investigation.</p> <p>While interviewing the Agency Head, he stated that the Virginia State Police handle all criminal cases and that his agency handles all administrative cases. The Agency Head also stated that when a sexual abuse allegation is made, an initial inquiry is conducted by a trained investigator. That information is turned over to the PREA Coordinator and a review is conducted by command. A command member makes notification with the state police for investigation. If it is determined that there is no criminal activity, the CVRJ performs an administrative investigation.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative or criminal investigation is completed on all allegations of sexual abuse and sexual harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.22 Provision (b)</p> <p>The agency’s website at <a href="http://www.CVRJ.org">http://www.CVRJ.org</a> states that, “The Central Virginia Regional has a zero-tolerance policy for all forms of sexual abuse and sexual harassment against Inmates. The Central Virginia Regional Jail takes any and all reports of sexual assault very seriously - maintaining a professional demeanor is a must; this includes ALL Inmates, Jail Employees, Contractors and Volunteers. It is the Policy of the Central Virginia Regional Jail 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”.</p>

CVRJ Prevention policy R-1.05, page 2, section A, paragraph 10 states in part that; any allegations of sexual abuse that appear criminal will be referred to the Virginia State Police Bureau of Criminal Investigations for criminal investigation. The interview with an investigative staff member revealed that the Virginia State Police conducts all criminal sexual abuse allegations.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an outside law enforcement agency with jurisdiction performs criminal investigations on all allegations of sexual abuse. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

Provision (c):

The Virginia State Police Bureau of Investigations are responsible for all investigations involving criminal activity at the CVRJ, to include all sexual abuse allegations. However, the CVRJ has tried and has provided proof that they have been unable to enter into a memorandum of agreement with the Virginia State Police. This PREA Auditor contacted the VSP Bureau of Investigations and confirmed with a supervisor that the State Police will send a detective to the facility for investigative purposes upon request from the CVR and confirmed this practice in past instances. The Virginia State Police is obligated to conduct a criminal investigation upon notification by the facility and therefore, a MOU is not needed.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the agency to ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

115.31	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Training Policy R-1.07</li> <li>c) CVRJ PREA Training Outline</li> <li>d) CVRJ PREA Quiz</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Random Staff</li> </ul> <p>Observations made during the On-Site Audit and Document Review</p> <p>115.31 Provision (a)</p> <p>The CVRJ provides PREA refresher training to all their employees on an annual basis. The facility also trains contractors and volunteers during their initial orientation process and then annually. New hires are trained while in the academy and then on an annual basis. The CVRJ has provided agency policy R-1.07 that states all CVRJ employees that have contact with inmates will be trained on zero-tolerance, inmates' rights, the right to be free from retaliation, dynamics of sexual abuse in a jail setting, common reactions to sexual abuse, how to detect and respond to signs of sexual abuse, inappropriate relationships, awareness of VA code 18.2-64.2 (carnal knowledge of an inmate), cross gender and transgender pat searches, effectively communicating with LGBTQ inmates, and mandatory reporting laws. The agency has also provided a PREA training outline depicting this training curricula.</p> <p>During the interview process 12 random staff were asked if they had received PREA training and if so, when. All 12 inmates indicated that they have received the training. 10 staff members stated that they receive training on an annual basis. One officer stated he receives training quarterly and a newly hired officer stated that he received training one week ago. To clarify the quarterly training, the auditor interviewed a veteran officer who stated that they receive refresher PREA training yearly and read the PREA policy on a quarterly basis.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to train all employees on all relevant topics outlined in this standard provision. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.31 Provision (b)</p> <p>The training provided by the CVRJ staff covers both male and female inmates. Therefore, there is no need to require additional training for gender specific facilities due to a transfer. This facility houses both male and female inmates.</p> <p>The evidence collected for this provision shows that the agency has trained all employees in all aspects of PREA, regardless of specific gender facilities. Therefore, there is no need to provide additional training when transferred to a facility that holds only one specific gender.</p> <p>115.31 Provision (c)</p> <p>The CVRJ provides PREA training on a yearly basis. All new employees receive initial training when attending the academy. All new contractors and volunteers receive their initial training during the orientation process and then annually. This practice was confirmed by sampling 13 employee training records. The files indicated that all 13 employees received initial PREA</p>

training, 12 acknowledged receiving the training and 9 documented receiving refresher training.

The evidence collected for this provision shows that the agency has provided initial and refresher PREA training to all their employees at least once a year. Therefore, through written policy and file review observations, the agency has demonstrated that it meets this provision.

Provision (d)

The CVRJ provided examples of employee training acknowledgement forms that requires the employee to sign acknowledging that he/she understands the training that was provided. The agency also provided PREA training rosters and PREA Quizzes with names and scores.

The evidence collected for this provision shows that the agency has provided documentation through employee signature, acknowledging that the employee understands the training received. Therefore, through written policy and file review observations, the agency has demonstrated that it meets this provision.

115.32	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Training Policy R-1.07</li> <li>c) CVRJ Volunteer Acknowledgement form</li> <li>d) CVRJ Contractor Acknowledgement form</li> <li>e) CVRJ Volunteer Handbook</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with Volunteer</li> <li>b) Interview with Contractor</li> </ul> <p>115.32 Provision (a)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 2 section 4 states in part that; all volunteers and contractors, who have contact with inmates will be trained on the CVRJ PREA policy and its zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>The facility currently has 62 contractors and volunteers with 100% participation in training. There are eleven contractors, 26 educational volunteers, and 25 religious volunteers. Volunteers are trained during their initial orientation and are provided with a volunteer handbook that outlines the responsibilities. Contractors are never left alone with inmates and must be escorted by security staff. The contractors are verbally informed and must acknowledge this conversation by signing an acknowledgement form. The facility maintains all copies of signed volunteer and contractor acknowledgement forms.</p> <p>During the interview with both a volunteer and contractor the auditor asked if they had been trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection, and response. Both individuals answered in the affirmative.</p> <p>While performing the document review the auditor observed several signed acknowledgement forms from both volunteers and contractors.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors that have contact with inmates are trained on the prevention, detection, and response policies regarding sexual abuse and sexual harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.32 Provision (b)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 2 section 4 states in part that; all volunteers and contractors, who have contact with inmates will be trained on the CVRJ PREA policy and its zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>The facility currently has 62 contractors and volunteers with 100% participation in training. There are eleven contractors, 26 educational volunteers, and 25 religious volunteers. Volunteers are trained during their initial orientation and are provided with a volunteer handbook that outlines the responsibilities. Contractors are never left alone with inmates and must be escorted by security staff. The contractors are verbally informed and must</p>

acknowledge this conversation by signing an acknowledgement form. The facility maintains all copies of signed volunteer and contractor acknowledgement forms.

When interviewing the volunteer, he stated that training consists of what to do when approached about sexual abuse. He would tell a supervisor and write a statement about the what had occurred. He stated that he has been notified of the agency's zero-tolerance policy. When the contractor was asked the same questions his response was that he is not sure of the specifics, however, he is considered a direct report due to his responsibilities and is always working with a nurse. The contractor stated that he would report sexual abuse to the officer working the post.

The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.32 Provision (c)

CVRJ Agency policy Training Policy R-1.07, page 2 section 5 states in part that; all training will be documented with the signature of the Employee, Volunteer, or Contractor verifying they understand the training.

The volunteer and contractor acknowledgement forms are maintained by the PREA Compliance Manager and observed during the document review phase of this audit. The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors documentation confirming that they received PREA training and understood that training. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring PREA training for both volunteers and contractors.

115.33	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Training Policy R-1.07</li> <li>c) CVRJ Inmate Handbook in English and Spanish</li> <li>d) PREA Posters in Spanish</li> <li>e) PREA video in Spanish</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with Intake Staff</li> <li>b) Interview with Random Inmates</li> </ul> <p>115.33 Provision (a)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 3 section 1 states in part that; all inmates during intake will receive a CVRJ Inmate Handbook explaining the jail’s zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse. The facility identified that there were 3492 inmates admitted into their facility in the last twelve months. Of those 3492 inmates all received the initial PREA information during the intake process.</p> <p>During the facility site review, this auditor requested that the booking officer provide me with an Inmate Handbook both in English and Spanish versions. The officer reached behind the desk and provided both handbooks at the time of the request. This proved that the books are available.</p> <p>During the interview with the Intake Officer he explained that part of his responsibility during the booking process is to issue every inmate upon commitment an inmate handbook which has the ways to report a sexual abuse allegation and the agency’s zero-tolerance policy. He also stated that there are posters mounted on the walls throughout the facility that explains these same instructions. When the auditor interviewed 13 random inmates they were asked if they had received information about the facility’s rules against sexual abuse and harassment. From those inmates interviewed, 12 stated that they had received the information. And 1 inmate stated he had not.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates receive information explaining how to report sexual abuse and the agency’s policy on zero-tolerance for sexual abuse or harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.33 Provision (b)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 3 section 2 states in part that; all inmates, within 30 days of intake will receive information about sexual abuse and sexual harassment through the classification process and will be documented on the PREA Educational information sheet. The CVRJ identified 868 inmates whose length of stay in the facility was over 30 days or more in the last twelve months. Of those 868 inmates the facility reports that all have received the comprehensive PREA education regarding sexual abuse or harassment. The Auditor interviewed an Intake Officer who stated that the classification officers show a</p>

PREA video during the process ensuring the inmates are educated regarding their rights to be free from sexual abuse and free from retaliation. When asked how long from the date of intake are inmates made aware of these rights, the officer stated approximately 24 hours. The auditor also interviewed 13 random inmates. Those inmates were asked If they were told about their right to not be sexually abused, how to report a sexual abuse, the right not to be punished for reporting a sexual abuse, and how long before they were made aware of these policies. From those 13 inmates, (Of these 13 inmates) 12 stated that they were told, and one said he was not. They identified several ways that they received this information. 6 inmates identified the handbook, 7 inmates identified the PREA Video, 3 inmates identified PREA paperwork and one stated that there is a recorded message on the phones that you must completely listen to every time you use the phone.

The auditor also had an opportunity to sit through a classification process of a newly admitted inmate. The auditor witnessed the risk screening questions being asked and observed the inmate watch the PREA video.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates receive a comprehensive education regarding their right to be free from sexual abuse, sexual harassment, and all forms of retaliation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (c)

CVRJ Agency policy Training Policy R-1.07, page 3 section 3 states in part that; current inmates who have not received such education shall be educate within 1 year of the effective date of the PREA Standards and the jail shall maintain documentation of inmate participation in these education sessions. However, this procedure is not relevant since all inmates at the CVRJ have been educated on sexual abuse and harassment. All inmates regardless of being transferred from another facility are required to go through the classification process and watch the PREA video.

When the Intake Officer was asked how they ensure that current inmates along with those transferred from another facility have been educated on agency's zero-tolerance policy on sexual abuse, he stated that when the inmate is booked-in there are a series of questions that are asked. Questions like if the individual has ever been sexually assaulted or if they are part of the LGBTQ community. He also stated that all inmates must be classified, and it is during that process that the inmate must watch a PREA educational video.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates who have not received PREA education shall be educated within 1 year of the effective date. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (d):

CVRJ Agency policy Training Policy R-1.07, page 3 section 4 states in part that; all inmates education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 42 U.S.C. formats include, but not limited to: Interpreters for the deaf, reading material to the visually impaired , and providing Interpreters services for non-English speaking inmates.

The CVRJ utilizes Video Remote Interpreting (VRI) for the deaf and has subtitles that is shown during the PREA educational video to ensure all inmates receive the information. The video is also audio for those who are visually impaired or those who may be limited reading skills. The CVRJ also provided documentation of versions of their inmate handbook, acknowledgement form, and PREA informational posters in Spanish.

The auditor had an opportunity to observe all the above listed information during the on-site

visit and a copy of the VRI contract.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency provide inmate education in formats accessible to all inmates, including those who are limited English proficient, Deaf, Visually impaired and limited reading skills. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (e)

The facility utilizes an acknowledgement form that is signed by the inmate and placed in the inmate's classification file. This information was verified by the auditor while reviewing inmate files during the document review phase of this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency maintains documentation of inmate participation in PREA education sessions. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### 115.33 Provision (f)

CVRJ Agency policy Training Policy R-1.07, page 3 section 4 states in part that; information will be continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

The agency has posters strategically posted throughout the facility, in every housing unit, and departments i.e. (kitchen, warehouse) to ensure compliance with PREA standards. Each inmate is also issued a CVRJ handbook with relevant information, including PREA educational material. The auditor personally observed these items during the facility site review.

The evidence collected for this provision shows that the agency has procedures in place to ensure that information will be continuously and readily available or visible to inmates. Therefore, through written policy and personal observations, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring PREA inmate education. And training for both volunteers and contractors.

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Training Policy R-1.07</li> <li>c) Certificate of Completion by the National Institute of Corrections (NIC)</li> </ul> <p>Interview:</p> <ul style="list-style-type: none"> <li>a) Interview with Investigative staff</li> </ul> <p>115.34 Provision (a)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 3 section C states in part that; all sexual abuse and sexual harassment investigators who conduct non-criminal investigations at the jail will receive specialized training. This specialized training is through the National Institute of Corrections online training and education portal. The facility provided certificates of completion for the online course titled, "Investigating Sexual Abuse in a Confinement Setting". The facility identified 10 investigators and provided specialized training certificates of completion for all ten of them.</p> <p>When interviewing the Investigative staff, the officer stated that he had received training through the NIC online training and attended an Investigator class in Virginia Beach. The officer stated that the classes dealt with the proper use of Garrity and Miranda in criminal cases. The class covered evidence collection and interviewing techniques.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that agency investigators receive specialized training inmates receive information explaining how to report sexual abuse and the agency's policy on zero-tolerance for sexual abuse or harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.33 Provision (b)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 3 section C states in part that; all sexual abuse and sexual harassment investigators who conduct non-criminal investigations at the jail will receive specialized training to include:</p> <ul style="list-style-type: none"> <li>Interviewing sexual abuse victims and witnesses</li> <li>Sexual abuse scene preservation</li> <li>The criteria and evidence required to substantiate a case for administrative action</li> <li>Proper use of Miranda and Garrity warnings</li> </ul> <p>During the interview with the investigative staff member he was asked if the training he received included the above listed topics the investigator stated that it did.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that all investigators are trained on specific criteria outlined in both the CVRJ policy and PREA standard 115.32 provision (b). Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.34 Provision (c)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 4, paragraph 3 states in part that; the PREA Coordinator will maintain documentation that the agency investigators have completed the</p>

required specialized training in conducting sexual abuse and sexual harassment investigations.

The CVRJ has provided copies of specialized training records for all staff trained in investigating sexual abuse in a confinement setting. This documentation is in the form of certificates of completion by the NIC online PREA "Investigating Sexual Abuse in a Confinement Setting Course."

The evidence collected for this provision shows that the agency has procedures in place to ensure that all staff responsible for investigating sexual abuse has received additional specialized training. Therefore, through written policy and personal observation by documents provided, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring specialized training for investigators who perform sexual abuse and sexual harassment investigations.

115.35	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ol style="list-style-type: none"> <li>CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>CVRJ Agency PREA Training Policy R-1.07</li> <li>Certificate of Completion by the National Institute of Corrections (NIC)</li> <li>CVRJ PREA training logs</li> </ol> <p>Interview:</p> <ol style="list-style-type: none"> <li>Interview with Medical &amp; Mental Health Staff</li> </ol> <p>Observations made during the on-site audit and document review.</p> <p>115.35 Provision (a)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 4 section D states in part that; all full and part time Medical and Mental Health Care Practitioners that work regularly in the jail will be trained in the following:</p> <ul style="list-style-type: none"> <li>• How to detect and assess signs of sexual abuse</li> <li>• How to preserve physical evidence of a sexual abuse</li> <li>• How to respond effectively to victims of sexual abuse and harassment</li> <li>• How and to whom to report allegations of sexual abuse and harassment</li> </ul> <p>The facility reported there are 10 medical and mental health staff employed by the CVRJ who work regularly and have received the specialized training as required by the agency's policy. During the pre-audit phase, the Auditor was provided copies of certificates of completion showing all 10 medical staff had completed the three-hour online course, "PREA 201 for Medical and Mental Health Practitioners" presented by the National Institute of Corrections. When interviewing the Medical and Mental Health Staff, they informed the Auditor that they had previously received initial training when they first started work and receive annual training. They also received additional training on the above listed topics by going online and taking PREA online classes offered by the National Institute of Corrections.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that medical and mental health personnel receive additional training as outlined in this standard. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.35 Provision (b)</p> <p>The University of Virginia Hospital performs forensic medical exams for this facility. Medical staff at this facility do not conduct forensic medical examinations. This practice was confirmed during the interview conducted with a member from the Medical Staff who stated that they do not perform forensic medical examinations. Therefore, this standard is not applicable to the CVRJ facility.</p> <p>The evidence collected for this provision shows that the agency does not perform forensic medical examinations. Therefore, this provision is not applicable to the CVRJ.</p> <p>115.35 Provision (c)</p> <p>CVRJ Agency policy Training Policy R-1.07, page 4, section D states in part that; the jail shall</p>

maintain documentation that Medical and Mental Health Practitioners have received the training referenced in this standard.

The CVRJ has provided copies of specialized training records for all medical staff. This documentation is in the form of certificates of completion by the NIC online class, "PREA 201 for Medical and Mental Health Practitioners."

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical staff has received additional specialized training. Therefore, through written policy and documents provided, the agency has demonstrated that it meets this provision.

#### 115.35 Provision (d)

During the pre-audit phase the facility provided copies of training logs indicating that medical staff receive the same in-service annual PREA training that security staff receives. In addition, while interviewing medical staff the auditor was told that they receive PREA training on an annual basis.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical staff receive (s) the same PREA training that volunteers, contractors, and security staff receive. In addition, they receive this training on an annual basis. Therefore, through written policy and documents provided, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring specialized training for Medical and Mental Health care.

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ol style="list-style-type: none"> <li>CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>CVRJ Agency PREA Risk Screening Policy R-1.03</li> <li>CVRJ PREA Screening Checklist Instrument</li> <li>Memorandum dated 10/10/2019 clarifying the handling of Sensitive Information</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>Interview with Staff performing Risk Screening</li> <li>Interview with Random Inmates</li> <li>Interview with PREA Coordinator</li> <li>Interview with PREA Compliance Manager</li> </ol> <p>Observations made during the on-site audit and document review.</p> <p>115.41 Provision (a)</p> <p>CVRJ Agency Screening Policy R-1.03, page 1 section A states in part that; all inmates will be screened during the classification using the PREA Screening Checklist Instrument for their risk of being sexually abused by other inmates or sexually abusive towards other inmates. The Auditor sat through a classification process of an inmate during the on-site phase of this audit. During that classification process the Auditor witnessed the inmate being asked those risk screening questions. Also, during the interviews with 13 random inmates 12 inmates recalled being asked the initial questions such as:</p> <ul style="list-style-type: none"> <li>• have they been in jail before?</li> <li>• have they ever been sexually abused?</li> <li>• did they identify with being LGBT?</li> <li>• did they think they might be in danger of sexual abuse while incarcerated when they first came to jail?</li> </ul> <p>When interviewing the staff responsible for performing the risk screening, the officer stated that he does conduct risk screening on all inmates during the classification process. The evidence collected for this provision shows that the agency has procedures in place to ensure all inmates receive a risk screening evaluation for the risk of being sexually abused while incarcerated. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.41 Provision (b)</p> <p>CVRJ Agency Screening Policy R-1.03, page 1 section A states in part that; the classification screening will normally take place within 72 hours of arrival to the facility. The agency reported that they received 1142 inmates into their facility in the last twelve months that had a length of stay more than 72 hours. The agency reports that all those inmates 100% received a risk screening assessment for possible risk of being sexually abused during incarceration. The agency provided samples of completed risk screening forms during the pre-audit phase and downloaded those documents into the Pre-audit Questionnaire. In addition, during the document review the Auditor observed completed PREA Risk Screening Checklist Instrument forms in the inmate files.</p> <p>When conducting the interview with staff responsible for performing risk-screening</p>

assessments, the officer stated that he usually conducts the classification process the day the inmate is booked into the facility. However, if the inmate is booked in after 1700 hours the classification staff will conduct the screening the following day and within a 24-hour period. As stated in the previous provision, when interviewing 13 random inmates' 12 inmates reported receiving risk screening within 24-hours of being processed into the jail.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates are screened for the risk of sexual abuse within 72 hours of arrival at the facility. Therefore, through written policy, personal observations, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (c)

The risk screening assessment consists of 10 potential victims 'yes or no questions' and 4 potential aggressors 'yes or no questions.' Each question that is answered by a yes has a number value associated with it. If the yes answers reach a certain number amount, then that person could be either classified as a potential victim or aggressor. There is no subjectivity to this assessment. Therefore, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (d)

CVRJ Agency Screening Policy R-1.03, page 1-2, section A, states in part that; the classification screening will consider at the minimum the following:

- Whether the inmate has a mental, physical, or developmental disability
- Age of inmate
- Physical build of inmate
- If the inmate has previously been incarcerated
- If the inmate's criminal history is exclusively nonviolent
- If the inmate has prior convictions for sex offenses
- If the inmate is or perceived to be LGBTQ or gender nonconforming
- If the inmate has previously experienced sexual victimization
- The inmate's own perception of vulnerability
- If the inmate is detained solely for civil immigration purposes

The staff member responsible for performing risk-screening assessments was asked what the risk screening considered and what is the process for conducting these assessments. The officer stated the assessment asks questions such as; has the inmate been sexually abused in the past, prior convicts of sexual assault, and the age and stature of the inmate. The officer also stated that they use a checklist of yes or no answers to score the assessment.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the intake screening shall consider at a minimum the 10 criteria identified in this standard provision. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (e)

The risk screening form utilized by the CVRJ classification staff does consider prior acts of sexual abuse, prior convictions for violent offenses, and a history of prior institutional sexual abuse. The staff member responsible for performing risk-screening assessments was asked what the risk screening considered and what is the process for conducting these assessments. The officer stated the assessment asks questions such as; has the inmate been sexually abused in the past, prior convicts of sexual assault, and the age and stature of the inmate.

The evidence collected for this provision shows that the agency has procedures in place to capture and ask the questions list above surrounding potential aggressor behavior. Therefore, through document review, and interviews conducted, the agency has demonstrated that it

meets this provision.

#### 115.41 Provision (f)

CVRJ Agency Screening Policy R-1.03, page 1-2, section A, states in part that; within 30 days from the inmates' arrival, the jail will reassess the inmate's risk of victimization or abusiveness based upon additional relevant information received by the jail since the classification screening. During the pre-audit, the facility reported 868 inmates were reassessed 30 days after their arrival at the facility for risk of sexual victimization based upon any additional relevant information received since intake over the last twelve months. Also, during the interview process an additional inmate was added to the targeted inmate list because of relevant information received by the facility the day prior about the inmate's possible vulnerability.

The staff member responsible for performing risk-screening assessments was asked how long after arrival are inmates risk levels reassessed. The officer stated within 30 days. When interviewing 13 random inmates they were asked if staff had ever asked PREA related questions again during their incarceration. 10 inmates stated that they had, and 3 inmates stated that they had not.

The evidence collected for this provision shows that the agency has procedures in place to conduct 30-day risk screening reassessments based upon additional or relevant information received by the facility. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (g)

CVRJ Agency Screening Policy R-1.03, page 1- section A, states in part that; an inmate's risk level will be reassessed due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. When interviewing the staff responsible for conducting risk screening the officer stated that they do reassess. The officer provided an example of an inmate that had denied being part of the LGBT community was reassessed due to additional information received that may bear on the inmate's vulnerability.

The evidence collected for this provision shows that the agency has procedures in place to reassess an inmate's risk of sexual victimization due to a referral, request, or additional information. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (h)

CVRJ Agency Screening Policy R-1.03, page 1- section A, states in part that; inmates will not be disciplined for refusing to answer or for not disclosing complete information in response to the risk screening.

When interviewing the staff responsible for conducting risk screening the officer stated that the agency does not punish inmates if they chose not to answer the questions associated with the risk screening assessment.

The evidence collected for this provision shows that the agency has procedures in place to prevent inmates from being disciplined for refusing to answer or for not disclosing complete information in response to risk screening. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 (i)

The agency provided a memorandum dated 10/102019 explaining the controls surrounding the dissemination of answers to the questions asked during the risk screening assessment. The memorandum states that the facility has control in place to ensure that dissemination of PREA risk screening does not take place. The risk screening is conducted by the classification

section that are responsible for determining an inmate custody level and future housing. Once the documentation is completed it is scanned into an electronic database (Laserfiche) under the classification folder. These Laserfiche files are restricted to supervisory staff, medical personnel, and the classification section.

When interviewing the PREA Coordinator and Compliance Manager they were asked who has access to the inmates' risk screening information. The Coordinator explained that he had access along with the classification officers, medical staff, and mental health. The Compliance Manager stated that classification section, Administrative staff, and Booking officers on the weekends. He further stated that no security officers have access and that the information is kept on Laserfiche. The staff member responsible for conducting risk screening explained that Administration, Classification, and Booking officers has access.

The evidence collected for this provision shows that the agency has procedures in place to control access to the risk screening information collected by the facility and that the information is not exploited. Therefore, through document review and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring screening for risk of victimization and abusiveness.

115.42	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Risk Screening Policy R-1.03</li> <li>c) Offender Management System (OAS) Classification Questions</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff performing Risk Screening</li> <li>b) Interview with PREA Compliance Manager</li> <li>c) Interview with Gay/Lesbian inmates</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.42 Provision (a)</p> <p>CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 7, states in part that; Information from the risk screening will be used to determine housing, bed, work, education, and program assignments to prevent inmates with the high risk of being sexually victimized from those at risk of being sexually abusive. The PREA Compliance manager stated during the interview that risk screening is part of the classification process and that they try to identify possible victims and predators to make sure they are not housed together. The staff member responsible for conducting risk screening stated during his interview that the assessment is used to make sure you identify those inmates that may be vulnerable and those that may be abusive and try to keep them as separate as possible during their incarceration.</p> <p>The evidence collected for this provision shows that the agency uses the information gathered during the risk screening process to influence the decision on where an inmate may be housed, attend programs, and works with the goal of keeping separate those inmates at high risk of being sexually victimized. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.42 Provision (b)</p> <p>The agency individually classifies each inmate not only based on the risk screening form but also the Offender Management System classification tool. This tool consists of an additional 47 questions along with criminal history reviews and institutional adjustment records.</p> <p>The evidence collected for this provision shows that the agency makes individualized determinations about how to ensure the safety of each inmate. Therefore, through document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.42 Provision (c)</p> <p>CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 8, states in part that; transgender and intersex inmates will be assigned to male or female blocks on a case-by-case basis and based on the health and safety of the inmate and the security needs of the jail. The PREA Compliance Manager was interviewed and asked how the agency determines housing and programs for transgender or intersex inmates. The Compliance Manager stated that he would meet with the inmate and discuss where the inmate would feel safe. Then a group consisting of the PREA Coordinator, Compliance Manager, Medical, and Mental health professionals would meet to discuss where the best place to house the inmate would be. The compliance manager also stated that the inmate would have full access to all programs.</p>

The evidence collected for this provision shows that the agency does consider housing assignments involving transgender and intersex individual on a case-by-case basis. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (d)

CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 10 states in part that; placement and programing assignments for each transgender or intersex inmate will be reassessed at least twice a year to review any threats to safety experienced by the inmate. The CVRJ facility reported not housing a transgender or intersex inmate at their facility over the last twelve months. When interviewing the staff member responsible for conducting risk screening assessments, he explained that all inmates have a 30-day review and he has not experienced a situation involving a transgender or intersex inmate. The PREA Compliance Manager also stated that classification reviews are completed on all inmates after the first 30 days then all inmates are reassessed every 3 months. Therefore, there are no examples or experience to relate to as evidence of compliance. However, the agency does have a policy to address this situation when it occurs.

The evidence collected for this provision shows that the agency has procedures in place to address reassessing a transgender or intersex inmates programming assignment at least twice a year to review any threats or safety concerns. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.42 Provision (e)

CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 9 states in part that; a transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. When the PREA Compliance Manager was asked that question, he stated that yes, they do consider the inmates own views when deciding appropriate housing. And when the staff member responsible for conducting risk assessment was asked the same question, he responded by stating yes, they take into consideration the individual's opinion. The evidence collected for this provision shows that the agency has procedures in place to consider a transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.42 Provision (f)

CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 11 states in part that; transgender and intersex inmates will be given the opportunity to shower separately from other inmates. The PREA Compliance Manager and the staff member responsible for conducting risk assessments were interviewed and asked if transgender and intersex inmates are afforded the opportunity to shower separately from other inmates, both officers stated that yes, they are allowed to shower separately.

The evidence collected for this provision shows that the agency has procedures in place to allow transgender and intersex inmates to shower separately from other inmates. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.41 Provision (g)

CVRJ Agency Screening Policy R-1.03, page 2- section A, paragraph 12, states in part that; lesbian, gay, bisexual, transgender, or intersex inmates will not be placed in dedicated blocks based solely on their identification or status unless in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmate.

During the interview process the PREA Compliance Manager confirmed that the agency was

not under any consent decree, legal settlement, or legal judgment requiring the facility to separate the LGBTQ community from everyone else. The PREA Coordinator stated during his interview that its against policy to segregate those inmates identified as LGBTQ solely on their sexuality. Finally, the Auditor interviewed 3 inmates that identified as LGBT. When asked if they had ever been housed in a unit solely based on their sexuality all 3 inmates stated that they had not.

The evidence collected for this provision shows that the agency has procedures in place to address not placing LGBTQ inmates in designated housing blocks based solely on their sexual orientation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the use of screening information.

115.43	<b>Protective Custody</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Risk Screening Policy R-1.03</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Staff who supervise Inmates in Segregation</li> <li>c) Interview with Inmates in Segregation</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.43 Provision (a)</p> <p>CVRJ Agency Screening Policy R-1.03, page 2, section A, paragraph 13, states in part that; inmates at high risk for sexual victimization will not be placed in segregated housing unless other alternatives are not available. Over the last twelve months, the agency reported that they did not assign any inmate to involuntary segregated housing for the purpose of separating that inmate due to the high risk for sexual victimization.</p> <p>The Warden / Designee stated during his interview that the agency does have a policy prohibiting placing inmates at high risk of sexual victimization in involuntary segregated housing in lieu of other housing areas.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address not using segregated housing for those inmates at high risk of victimization, unless no alternative means of separation is available. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.43 Provision (b)</p> <p>CVRJ Agency Screening Policy R-1.03, page 3, section A, paragraph 14, states in part that; inmates who have alleged to suffer sexual abuse and is placed in segregation for protection will have access to program privileges, education, and work opportunities to the extent possible. The agency reported not experiencing an incident where an inmate was placed in segregation based on the high probability of sexual victimization. During the facility tour the auditor visited the special housing unit and reviewed the logbooks to verify that no inmate was being housed involuntarily, due to the risk of being sexually victimized.</p> <p>The staff member working in segregated housing stated during his interview that if an inmate was placed in segregation based on possible sexual victimization, that inmate would still have access to all the privileges and opportunities that all other inmates would have. He stated that the housing assignment is not seen as a punishment.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to the high risk of being sexually victimized that the inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.43 Provision (c)</p> <p>CVRJ Agency Screening Policy R-1.03, page 3, section A, paragraph 15, states in part that; inmates in segregated housing will be reviewed at least every 30 days to determine whether</p>	

there is a continuing need for separation from the general population. The agency reported not experiencing an incident where an inmate was placed in segregation based on the high probability of sexual victimization.

The Warden/Designee was interviewed and stated that only if there were no alternatives would an inmate be involuntarily segregated because of the possibility of being sexually victimized. He further stated that if that was the case the inmate's situation would be evaluated every two days by the Institutional Classification Committee (ICC). The Warden/Designee explained that at the most an inmate would stay in segregation for no more than 15 days. When the staff member assigned to the special segregated housing unit was asked the same questions, he stated that once an inmate is pulled out of a dangerous situation the inmate can then be reclassified and moved back into population. He also stated that he has no specific example where an inmate was placed in involuntary segregation based on the high risk of victimization.

The evidence collected for this provision shows that the agency has policies in place to ensure that if an inmate is placed in involuntary segregation, such assignment would not exceed 30 days. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.43 Provision (d)

CVRJ Agency Screening Policy R-1.03, page 3, section A, paragraph 16 states in part that; if an inmate is involuntarily housed in segregation, it shall be clearly documented:

- The basis for the facility's concern for the inmate's safety; and
- The reason why no alternative means of separation can be arranged

The CVRJ facility reported not assigning any inmate to involuntary segregated housing for the purpose of separating that inmate due to the high risk for sexual victimization.

The evidence collected for this provision shows that the agency has procedures in place to address documenting the basis for the segregation and why no alternative means of separation could be arranged. Therefore, through written policy, the agency has demonstrated that it meets this provision.

#### 115.43 Provision (e)

CVRJ Agency Screening Policy R-1.03, page 3, section A, paragraph 15, states in part that; inmates in segregated housing will be reviewed at least every 30 days to determine whether there is a continuing need for separation from the general population. The staff member assigned to the special housing unit stated during his interview that classification officers review all inmates that are assigned to segregation once every 30 days.

The evidence collected for this provision shows that the agency has procedures in place to reassess and review an inmate's housing assignment every 30 days to is If there is a continued need for separation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring limitations on protective custody.

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Reporting Policy R-1.04</li> <li>c) Inmate Handbook both in English and Spanish</li> <li>d) PREA Poster in both English and Spanish. The poster provides the four ways to report sexual abuse and sexual harassment.</li> <li>e) MOU between the CVRJ and Rappahannock Rapidan Community Services Board to provide outside reporting.</li> <li>f) Staff Reporting Methods Power Point</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 31 interviews with diverse staff</li> <li>b) 27 interviews with various inmates</li> <li>c) Interview with PREA Compliance Manager</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.51 Provision (a)</p> <p>The agency has provided multiple ways to report a sexual abuse or sexual harassment allegation in a private setting. These reporting options are listed in written policy, confirmed through interviews, and observed through posters and handouts. The Inmate Handbook specifically addresses four ways to report an allegation of sexual abuse or harassment. Those involved making a verbal or written report to any staff member, submitting an (Inmate Request Form), having a 3rd party make a report for the alleged victim, or calling the outside reporting authority at 540-672-9603 (inmate phone system #1234). The contact information and phone number are provided in the handbook. In addition, PREA posters are displayed throughout the facility both in English and Spanish listing the ways an individual can report an allegation of sexual abuse. The staff training curricula consists of a PowerPoint that provides staff ways to report. Those ways are verbally to any supervisor, PREA Coordinator, PREA Compliance Manager, submit a written report, or contact the outside reporting agency via hotline. Finally, the agency has written policy that outlines the four recommended ways to report an allegation of sexual abuse.</p> <p>During the on-site audit, the Auditor performed 31 staff interviews and 27 inmate interviews. To further break down the interviews they were characterized by 12 random staff interviews, 19 specialized positions, 13 random inmates, and 14 targeted inmates. Of the 31 staff that was interviewed 23 staff members could identify all four ways to report. All 31 staff members could at least identify two ways to report a sexual abuse allegation. Of the 27 inmates that were interviewed, 6 inmates could offer four ways to report sexual abuse, 9 inmates could offer three ways, 5 inmates identified two ways and 6 inmates provided at least one way to report. Every inmate interviewed could name at least one way to report an allegation of sexual abuse.</p>

During the on-site review, the Auditor observed and documented PREA posters posted in both housing units and in public areas throughout the facility. The Auditor requested investigation files that provided documentation of alleged sexual abuse with dispositions. The Auditor contacted Just Detention International and confirmed they had received a sexual abuse allegation in 2019.

The evidence collected shows that the facility has provided multiple ways to report sexual abuse or sexual harassment. The evidence also shows that many staff and inmates are aware of those reporting procedures. Confirming the information is being provided. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Provision (b)

The agency has entered into a memorandum of agreement with the Rappahannock Rapidan Community Services Board (RRCSB) to provide a phone number that an inmate or staff can call, anonymously if they choose to report allegations of sexual abuse. The phone number is listed in the Inmate Handbook and on the PREA posters located throughout the facility. This fact was confirmed through the on-site observation of the facility. During the facility site review the auditor requested that a call be generated to the outside agency as a test the procedure. A response to our request for a return call was received by the PREA Compliance Manager that day.

No inmates housed in this facility is solely detained for civil immigration purposes. However, the CVRJ does hold ICE detainees for federal crimes and does provide those inmates with information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security. This information is provided in the Inmate Handbook both in English and Spanish. This was confirmed by the agency providing a memorandum dated 10/10/2019 authored by the Superintendent stating; The CVRJ does not accept or house inmates that are detained solely for civil immigration purposes.

The evidence collected for this provision shows that the agency has provided at least one way for an inmate to report abuse or harassment to a public or private entity not affiliated with the agency. The inmate can also report anonymously if they choose in accordance with the RRCSB MOU. Lastly, the CVRJ does not allow the detention of an inmate for the sole purpose of immigration status. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Provision (c)

The agency has a policy under CVRJ Agency PREA Reporting Policy R-1.04 that directs staff to accept all reports of sexual abuse verbally, in writing, anonymously, and from third parties. The policy also stated that an incident report shall be immediately documented.

When reviewing the investigative files, written reports from officers documenting verbal allegations were present. During staff interviews the officers explained that their duties were to immediately write a report recording the verbal sexual allegation. When interviewing inmates

several explained that they would notify a supervisor or security officer. However, there was no clear answer to what the term “immediate” meant. Therefore, it was when the PREA Compliance Manager was interviewed and asked to define what “immediately” meant according to the policy. The Compliance Manager explained that immediately is defined as before the end of the officer’s tour of duty for that day. In addition, all the PREA posters displayed throughout the facility states that an allegation of sexual abuse can be reported verbally.

The CVRJ procedure is clear that if an allegation is made through the grievance process the Grievance Director will immediately send the allegation to the PREA Coordinator or PREA Compliance Manager for further investigation. The Grievance process would immediately cease, and an investigation would be initiated into the allegation of sexual abuse.

The evidence collected for this provision shows that the agency has demonstrated that they accept and document sexual abuse reports verbally, in writing, and from third parties. It has also been determined that these reports have been handled in a timely fashion. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Provision (d)

The agency provides staff with the outside reporting agency’s contact information for the Rappahannock Rapidan Community Services Board. This contact information and phone number can be found in the CVRJ’s PREA Reporting Policy R-1.04 along with being posted on the PREA posters located throughout the facility. In addition, the staff are also encouraged to verbally report sexual abuse or harassment to a supervisor or PREA Coordinator. The contact number for the RRCSB can be seen on the PREA posters witnessed during the on-site observation tour. It has also been confirmed through staff interviews that they are aware of how to go about privately notifying authorities regarding allegations of sexual abuse or harassment.

The evidence collected for this provision shows that the agency has demonstrated that they do provide staff with a private method of reporting sexual abuse or sexual harassment of inmates. Therefore, through written policy, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency provide multiple internal ways for inmates to privately report sexual abuse or sexual harassment. No corrective action is required.

115.52	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Reporting Policy R-1.04</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with PREA Compliance Manager</li> <li>b) Interview with Agency Head</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>The agency has a policy that places limitations on what allegations can be handled through the grievance process. The agency's procedure is that if the grievance director receives a grievance alleging sexual abuse or sexual harassment by staff or sexual abuse by an inmate, the grievance is immediately handed over to the PREA Coordinator or PREA Compliance Manager for further investigation. The grievance process is immediately stopped, and an administrative investigation is immediately initiated. Therefore, this agency is exempt from this standard and not applicable.</p> <p>.</p>

115.53	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Medical &amp; Mental Health Care Policy R-1.06</li> <li>c) Inmate Handbook both in English and Spanish</li> <li>d) PREA Poster in both English and Spanish. The poster provides the contact information either by phone or mailing address to a Rape Crisis Center Advocate.</li> <li>e) MOU between the CVRJ and Services to Abused Families, Inc. (SAFE) to provide outside advocacy for inmates.</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Inmates who reported a Sexual Abuse</li> <li>b) 27 interviews with various inmates</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.53 Provision (a)</p> <p>The agency has a policy under CVRJ Agency PREA Medical &amp; Mental Health Care Policy R-1.06 that states that; inmates will be provided access to an outside Advocacy Group through the use of a mailing address and hotline number for outside emotional support services related to sexual abuse. The CVRJ has entered into a MOU with SAFE to provide crisis intervention services and emotional support. SAFE services are provided by mail, a phone hotline, and in person, upon request. SAFE also provides sexual assault educational materials in areas accessible to inmates. The contact information for SAFE is located on all the PREA posters displayed in all the housing units. The auditor observed these posters during the facility tour. In addition, the contact information for SAFE can be found in every inmate handbook, which is issue to every inmate upon commitment into the facility. The hotline is free of charge to the inmate and the SAFE phone number is not being recorded by the facility. Outgoing facility mail is scanned, opened or read. The crisis intervention services are confidential, and the crisis center has no duty to report unless involving a juvenile.</p> <p>The agency provided a memorandum date 10/10/2019 from the Facility Superintendent that states that the CVRJ does not hold ICE inmates solely for Civil Immigration purposes.</p> <p>During the on-site audit, the Auditor performed 27 inmate interviews. 19 inmates were aware that services are available outside the facility for dealing with sexual abuse, while in the facility. 8 stated that they were not aware of such services. Those inmates that were aware of the services also knew how to contact the crisis center. They were also cognizant that the phone hotline was free of charge and that the call can be made 24 hours a day 7 days a week. The Auditor also interviewed 4 inmates that reported a sexual abuse while housed in the facility. 2 inmates stated that the facility does provide mailing addresses and phone number for outside services. They also knew the calls were free. One inmate has utilized the hotline to obtain services. The other 2 inmates stated that they did not receive any information on outside services information. ways, 5 inmates identified two ways and 6 inmates provided at least one way to report. Every inmate interviewed could name at least one way to report an allegation of</p>

sexual abuse.

The evidence collected for this provision shows that the agency has procedures in place to provide crisis intervention services from an outside advocacy group free of charge that is confidential. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.53 Provision (b)

The CVRJ informs inmates through a pre-recorded phone message that their calls may be monitored before making every call. The inmate handbook also informs the inmates that their calls are subject to monitoring and may be referred out for investigation. The Auditor performed 27 inmate interviews. The 19 inmates that were aware of these services assumed that the information was confidential, but not certain.

The evidence collected for this provision shows that the agency does inform inmates the extent to which their communications are being monitored. Therefore, through agency procedures, personal observations, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.53 Provision (c)

The agency has provided a copy of a MOU between the CVRJ and SAFE dated 03/25/2016 as proof that confidential emotional support services are being provided to the inmates at the CVRJ. The expiration date for this MOU is for 12/31/2019.

The evidence collected for this provision shows that the agency has entered into a MOU with an outside advocacy group to provide the inmates emotional support as it relates to sexual abuse. Therefore, through the signed MOU and personal observation the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard requiring the agency provide inmate access to outside confidential support services. No corrective action is required.

<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) Memorandum of Understanding between the CVRJ and the Rappahannock Rapidan Community Services Board (RRCSB)</li> <li>c) Agency Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Staff who supervise Inmates in Segregation</li> <li>c) Interview with Inmates in Segregation</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.54 Provision (a)</p> <p>The CVRJ has entered into a Memorandum of Understanding (MOU) with the Rappahannock Rapidan Community Services Board (RRCSB) to provide service as an outside reporting designee for the CVRJ inmates. The inmates can report by email, mail, or phone 24/7/365 days a year. The RRCSB will take the information received related to a sexual abuse allegation and immediately contact the facility with the information gathered. The inmate or reporting party can remain anonymous upon request. The CVRJ also has posters displayed at the entrance of the facility to inform visitors or professional staff on how they can report an allegation of sexual abuse for an inmate housed in the CVRJ, these posters were observed by the Auditor during the facility tour. Finally, the agency's website has information posted explaining how someone would report a sexual abuse on behalf of an inmate housed in the CVRJ.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address third-party reports of sexual abuse or harassment both formally and publicly. Therefore, through document review and personal observations, the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a method to receive third-party reports alleging sexual abuse and distribute that information publicly. No corrective action is required.</p>

115.61	<b>Staff and agency reporting duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Reporting Policy R-1.04</li> <li>c) Memorandum stating procedures for notifying certified PREA investigators</li> <li>d) Superintendent Memorandum dated 10/10/2019 stating that the CVRJ does not house Juvenile Inmates</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 31 Interviews with diverse staff</li> <li>b) Interview with Warden or Designee</li> <li>c) Interview with Medical or Mental Health Staff</li> <li>d) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.61 Provision (a)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 1 section A, paragraph 1 states in part that; all staff are required to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment, retaliation against inmates or staff, and any staff neglect that may have contributed to an incident or retaliation that occurs at the CVRJ or any other facility to a supervisor.</p> <p>During the interview process this Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address immediately reporting any knowledge, suspicion, or information regarding sexual abuse or sexual harassment. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.61 Provision (b)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 1 section A, paragraph 2 states in part that; staff will not reveal any information related to a sexual abuse report to anyone except designated supervisors, Officials, who are responsible for treatment, investigation, and other security and management decisions.</p> <p>During the interview process this Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor and must only rely information on a need to know basis.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address not revealing information related to a sexual abuse report to anyone other than to the extent necessary. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.61 Provision (c)</p>

CVRJ PREA Reporting Policy R-1.04, page 1 section A, paragraph 3 states in part that; Medical and Mental Health Staff are required to report sexual abuse and required to inform inmates of staff's duty to report, and the limitations of confidentiality.

The Auditor interviewed 2 Medical and Mental Health staff. The medical professional stated that they do notify the inmate of the duty to report sexual abuse allegations and the limitations surrounding confidentiality. She also stated that they have a duty to report all suspicions, knowledge, or information regarding sexual abuse. In addition, the medical professional stated that she had experienced a situation where an alleged sexual abuse allegation had been made and she immediately notified a supervisor. The mental health professional stated the he does not initially explain the limitations with confidentially. However, he stated that he does have a responsibility to report any suspicions, knowledge or information regarding sexual abuse if it occurred within the facility. The mental health professional stated that he had experienced one time over two years ago when he was made aware of an alleged sexual abuse report. He stated that he immediately reported the incident to the PREA Compliance Manager.

The evidence collected for this provision shows that the agency has procedures in place to require medical and mental health practitioners to report any incidents they have been made aware of involving the knowledge, suspicion, or information regarding sexual abuse. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.61 Provision (d)

The agency provided a memorandum authored by the Facility Superintendent stating that his facility does not accept or house any juvenile inmates. In addition, both the PREA Coordinator and Warden/Designee were interviewed and stated that the CVRJ does not house juveniles or currently house vulnerable adults. Therefore this provision is not applicable to this facility.

#### 115.61 Provision (e)

The agency has provided a written memorandum explaining the procedure for notifying PREA certified investigators when allegations of sexual abuse have been made. The memorandum in part states that; after the victim and aggressor and been separated the shift supervisor is notified. If during normal business hours, the shift supervisor will notify one of the lead PREA investigators. If the incident occurs during non-business hours, (weekends, holidays) the shift supervisor will notify the institutional duty officer which is comprised of upper level administrative staff who will contact both the PREA Coordinator and PREA Compliance Manager. One of those two individuals will respond and perform the investigation. If the investigation appears to be criminal in nature, a call will be made to the Superintendent who instructs that the Virginia State Police be contacted.

During the document review the Auditor evaluated 10 investigative files. The files showed that the facility followed these procedures in those cases. The Warden/Designee was also interviewed and explained yes, all allegations of sexual abuse to assigned to a PREA trained investigator.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all allegations of sexual abuse is turned over to a PREA designated investigator to initiate an inquiry. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring staff and agency

reporting duties. No corrective action is required.

115.62	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Prevention Policy R-1.02</li> <li>c) 4 incident reports of alleged sexual abuse or sexual harassment</li> <li>d) Superintendent Memorandum dated 10/10/2019 stating that the CVRJ does not house Juvenile Inmates</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) 31 Interviews with diverse staff</li> <li>b) Interview with Warden or Designee</li> <li>c) Interview with Agency Head</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.62 Provision (a)</p> <p>CVRJ PREA Prevention Policy R-1.02, page 2 section B, paragraph 10 states in part that; when the agency deems an inmate to be subject to be a substantial risk of imminent sexual abuse immediate action must be taken. The Pre-Audit Questionnaire response states that inmates are separated immediately in an event o fa sexual abuse or sexual harassment allegation. In the last twelve months the agency has reported there have been four incidents where the inmate was deemed a substantial risk of imminent sexual abuse. Those four investigations and incident reports were provided, and the action taken in all four instances were to separate the victim and aggressor immediately.</p> <p>Interviews were conducted with 12 random staff. Of those staff interviewed 11 staff members stated that they would immediately remove the inmate from the situation, block, or housing unit. One staff member explained that he would let a supervisor know and the supervisor would determine what steps to take. Also interviewed was the Agency Head and Warden/Designee. He stated that a housing change would immediately take place. Then a Classification officer would re-evaluate the information and determine the best and safest housing assignment moving forward.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address when an inmate is subject to a substantial risk of sexual abuse and immediate action is taken to protect that inmate. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring agency protection duties. No corrective action is required.</p>

<b>115.63</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Reporting Policy R-1.04</li> <li>c) Email notification from the CVRJ Superintendent and U.S. Marshals Service</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Agency Head</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.63 Provision (a), (b), and (c)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 13 states in part that; if the CVRJ receives an allegation that an inmate was sexually abused, while confined to another facility, the Superintendent or Designee will notify the facility administration where the alleged abuse occurred within 72 hours and the notification will be documented. All allegations received from other confinement facilities and agencies will be investigated in accordance with the PREA standards. The CVRJ reported one incident over the last twelve months where notification was made to another confinement facility about an allegation of sexual abuse. The CVRJ has provided a copy of the email exchange between agencies and the generated incident report involving that one incident. The auditor also interviewed the subject of this particular complaint.</p> <p>The evidence collected for these provisions shows that the agency has procedures in place to address when an allegation of sexual abuse is received from an inmate, but the incident occurred at a different confinement facility. Therefore, through written policy and document review the agency has demonstrated that it meets these provisions.</p> <p>115.63 Provision (d)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 13 states in part that; if the CVRJ receives an allegation that an inmate was sexually abused, while confined to another facility, the Superintendent or Designee will notify the facility administration where the alleged abuse occurred within 72 hours and the notification will be documented. All allegations received from other confinement facilities and agencies will be investigated in accordance with the PREA standards. The CVRJ has not received any alleged sexual abuse allegations from other confinement facilities where the incident occurred at the CVRJ.</p> <p>When the Warden/Designee was interviewed he stated that when his facility receives an allegation from another facility that an incident of sexual abuse or sexual harassment occurred in his facility an administrative investigation is launched. If it appears to be criminal in nature the Virginia State Police is contacted to investigate. The Agency Head/Designee stated that all sexual abuse allegations are turned over to the PREA Manager or Coordinator to investigate. The evidence collected for this provision shows that the agency has procedures in place to address when an allegation of sexual abuse is received from another agency and that the incident occurred at the CVRJ. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p>

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring the reporting to other confinement facilities. No corrective action is required.

115.64	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Reporting Policy R-1.04</li> <li>c) Copies of PREA Administrative investigations</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Security Staff First Responders</li> <li>b) Interview with Inmates that reported Sexual Abuse</li> <li>c) 31 Interviews with diverse staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.64 Provision (a)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 13 states in part that; the first security staff member to respond following a report of an alleged inmate sexual abuse will:</p> <ul style="list-style-type: none"> <li>Separate the victim and abuser</li> <li>Preserve and protect any crime scene</li> <li>Request that the victim and alleged abuser do nothing that would destroy physical evidence such as; washing, brushing teeth, urinating, changing clothes, drinking or eating.</li> </ul> <p>As of the date of this report, the facility reported, in the last 12 months, 6 inmates reported they were sexually abused. In 4 of those incidents the security staff member was first to respond and immediately separated the alleged victim and abuser; and the security staff was able to preserve any possible physical evidence at the scene. In 1 case the sexual abuse allegation was made about an incident that occurred years before at a different location and was reported to a non-security staff member. Finally, the last incident involved an anonymous letter sent to the PREA Compliance Manager. The investigation never revealed the author of the letter and the case was concluded as unfounded.</p> <p>An interview with a security staff first responder was conducted. The first responder was asked to describe the actions taken when first on the scene of an alleged inmate sexual abuse allegation. The first responder stated that he would make sure the scene was safe, separate the victim and alleged abuser, report to a supervisor, preserve the evidence, get medical to see them, write a report, and protect the possible crime scene. There were 3 inmates that reported sexual abuse interviewed during the on-site phase of the audit. 2 inmates indicated that the staff respond was quickly and 1 inmate stated it was not. The reporting of the alleged event varied from hours, a couple of days, to over a week. The alleged sexual abuse incidents were very different in nature to location, timeline, and allegation. Therefore, the security staff's respond depended on the actual allegation. In one incident the inmate stated that a bunch of people responded to include the PREA Coordinator and Compliance Manager. One inmate stated that they called him/her a liar and the last inmate's allegation is being investigated by another agency.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of staff first responder when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.</p>

115.64 Provision (b)

CVRJ PREA Reporting Policy R-1.04, page 2 section A, paragraph 5 states in part that; if the first responder is not a security staff member, the responder will request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. The facility did report one alleged sexual abuse incident where the first responder was not a security staff member and the staff member immediately notified the PREA Compliance Manager.

When conducting interviews, 12 random staff were questioned about their responsibilities when confronted with an allegation of an inmate sexual abuse. The responses were broken down into six general topics that was recognized and overlapping during the interviews. All 12 staff members stated they would separate the victim and abuser; 11 staff members would also contact a supervisor. 6 staff members mentioned contacting medical personnel, 11 staff members cited preserving evidence, 7 staff members said they would secure the scene and 2 staff members stated they would write a report.

The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of non-security staff first responders when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Staff first responder duties No corrective action is required.

<b>115.65</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Coordinated Response document</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.65 Provision (a)</p> <p>The CVRJ has provided an outlined coordinated response plan for this facility to follow when confronted with an inmate sexual abuse incident. The document outlines the procedures /steps to follow and includes the actions of the first responders, medical &amp; mental health practitioners, investigators, and facility leadership. In an interview with the Warden/Designee it was confirmed that the agency has and uses a coordinated response plan to follow when dealing with incidents of alleged inmate sexual abuse.</p> <p>The evidence collected for this provision shows that the agency has a coordinated response plan to follow during incidents of alleged inmate sexual abuse. Therefore, through written policy, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a coordinated response. No corrective action is required.</p>

<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) Code of Virginia 40.1-57.2 (Prohibition against Collective Bargaining)</li> <li>c) Superintendent Memorandum dated 10/10/2019</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head or Designee</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.66 Provision (a)</p> <p>Employees in the Commonwealth of Virginia do not have collective bargaining rights per the Code of Virginia 40.1-57.2. There is no collective bargaining agreement entered into since August 2012. This was confirmed by the Auditor during the interview with the Agency Head. In addition, the agency provided a memorandum from the Superintendent stating that the CVRJ has not entered into or renewed any collective bargaining agreements nor is it part of a union. The evidence collected for this provision shows that this standard is not applicable to this agency or any confinement agency in the Commonwealth of Virginia if it chooses not to engage in collective bargaining. Therefore, through state law and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that this standard is not applicable to this agency. No corrective action is requ</p>

115.67	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Reporting Policy R-1.04</li> <li>c) PREA Retaliation Monitoring Form</li> <li>d) Copies of PREA Administrative Investigations</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head / Designee</li> <li>b) Interview with Warden / Designee</li> <li>c) Interview with Staff Member charged with Monitoring Retaliation</li> <li>d) Inmates who reported Sexual Abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.67 Provision (a)</p> <p>CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 14 states in part that; staff or inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will not be subject to retaliation by other staff or inmates. The designated staff member charged with monitoring possible retaliation is the PREA Compliance Manager 1st Lieutenant Brian Bachert.</p> <p>The evidence collected for this provision shows that the agency has procedures in place and staff to monitor retaliation associated with reports of sexual abuse. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.</p> <p>115.67 Provision (b)</p> <p>The agency has provided several incident reports of alleged sexual abuse or sexual harassment. In those reports the agency employed multiple protection measures. For example; the alleged abuser was immediately moved to different housing, several alleged inmate victims were referred to mental health professionals, the alleged abuser was re-evaluated for suitable housing, and a couple alleged abusers were reclassified as sexual predators. In addition, both the Agency Head and Warden were interviewed and explained that they could use multiple ways to protect inmates or staff from retaliation. They spoke of changing housing assignments, transfers, providing mental health treatment, and requesting a curtesy hold for the abuser. The staff member charged with monitoring retaliation stated that he monitors the situation, talks to the individuals involved and documents their conversations. He also stated that he encourages the individuals involved to contact him directly if they experience what they believe to be retaliation. When interviewing the 3 inmates that reported sexual abuse; 2 inmates explained that they felt confident that they are being monitored for possible retaliation.</p> <p>The evidence collected for this provision shows that the agency employs multiple protection measures for those inmates and staff who fear retaliation. Therefore, through document review, and interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.67 Provision (c)</p>

CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 15 states in part that; after the report of sexual abuse the Superintendent or his designee will monitor the conduct and treatment of inmates / staff who reported sexual abuse or who have cooperated with sexual abuse investigators for at least 90 days for possible retaliation. The agency reports that there have been no incidents of retaliation that has occurred at their facility over the last twelve months. The agency did provide examples of documented PREA Retaliation Monitoring forms from previous investigations.

The Warden / Designee stated that when he suspects retaliation, he will immediately initiate an investigation. Based on the findings of that investigation staff may receive discipline up to termination and inmates can be charged both with in-house charges and criminal prosecution. The staff member charged with retaliation monitoring stated that he monitors individuals for at least 90 days but will continue to monitor if he feels it necessary and no threat exists.

The evidence collected for this provision shows that the agency monitors both staff and inmates who have alleged sexual abuse or assisted in the investigation for a minimum of 90 days. Therefore, through written policy, document review, and interviews conducted the agency has demonstrated that it meets this provision.

#### 115.67 Provision (d)

When conducting the interview with the staff member responsible for monitoring retaliation, he stated that he meets with the alleged inmate victim once a month. At those meetings the inmate is encouraged to contact him directly if the inmate experiences or believes he /she is being retaliated in any way.

The evidence collected for this provision shows that the agency monitors inmates for retaliation periodically. Therefore, through interviews conducted the agency has demonstrated that it meets this provision.

#### 115.67 Provision (e)

CVRJ PREA Reporting Policy R-1.04, page 3 section A, paragraph 14 states in part that; staff or inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will not be subject to retaliation by other staff or inmates. The evidence collected for this provision shows that the agency has procedures in place to address protection for other individuals who cooperate with PREA investigations from retaliation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring agency protection from retaliation. No corrective action is required.

<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Risk Screening Policy R-1.03</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Staff who supervise Inmates in Segregation</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.68 Provision (a)</p> <p>CVRJ Screening Policy R-1.03, page 3, section A, paragraph 14, states in part that; inmates who have alleged to suffer sexual abuse and placed in segregation will have access to program privileges, education, and work opportunities to the extent possible. Over the last 12 months, the agency reported that they had not assigned any inmate who alleged to have suffered sexual abuse to involuntary segregated housing, for the purpose of separating that inmate due to no other housing alternatives. During the facility tour, the Auditor visited the special housing unit and reviewed the logbooks to verify that no inmate was being housed involuntarily, due to alleging sexual abuse.</p> <p>The Warden / Designee stated during his interview that the agency does have a policy prohibiting placing inmates who alleged to have suffered sexual abuse in involuntary segregated housing, in lieu of other housing areas. He also stated that only if there were no alternatives would an inmate be involuntarily segregated because of alleging sexual abuse. He further stated that if that was the case the inmate's situation would be evaluated every 2 days by the Institutional Classification Committee (ICC). The Warden/Designee explained that at most an inmate would stay in segregation for no more than 15 days.</p> <p>The staff member working in segregated housing stated during his interview that if an inmate was placed in segregation based on being an alleged victim of a sexual abuse, that inmate would still have access to all the privileges and opportunities that all other inmates would have. He stated that the housing assignment is not seen as a punishment. The staff member also stated that he has no specific example where an inmate was placed in involuntary segregation based on alleging a sexual abuse.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to alleging sexual abuse that inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring limitations on protective custody.</p>



115.71	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Investigations Policy R-1.05</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Investigative Staff</li> <li>c) Interview with PREA Coordinator</li> <li>d) Interview with PREA Compliance Manager</li> <li>e) Interview with Inmates that reported sexual abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.71 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 1, section A, paragraph 1, states in part that; all investigations into allegations of sexual abuse and sexual harassment, including third-party and anonymous reports will be done promptly, thoroughly, and objectively through the coordinated actions among first responders, medical and mental health practitioners, investigators, and administration.</p> <p>The Auditor reviewed 10 investigative files during the document review. The average length of investigation for those 10 files were approximately 6 days. During the interview with the investigative staff, the investigator stated that an administrative investigation is immediately initiated once notification is made. He also stated that he is on call for these types of situations. The investigator stated that anonymous and third-party reports are handled exactly in the same manner as all other sexual abuse allegations.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that it investigates sexual abuse allegations promptly, thoroughly, and objectively. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.71 Provision (b)</p> <p>CVRJ Investigations Policy R-1.05, page 1, section A, paragraph 2, states in part that; investigators with special training in sexual abuse investigations will be used when sexual abuse is alleged. The CVRJ reported that the agency has 10 PREA certified investigators. During the pre-audit phase, this Auditor requested training records for all 10 investigators. The facility provided that information and the Auditor verified that those 10 investigators had received special sexual abuse training in a confinement setting. During the interview process the investigator confirmed that he had received additional training from the National Institute of Corrections and attended an extra investigator training class in Virginia Beach VA.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that only specially trained sexual abuse investigators conduct investigations into sexual abuse allegations. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.71 Provision (c)</p>

CVRJ Investigations Policy R-1.05, page 1, section A, paragraph 3 & 4, states in part that; investigators will be responsible for gathering non-clinical evidence and information relating to the alleged sexual assault. In addition, investigators will interview alleged victims, suspected perpetrators, and witnesses and will review prior complaints and reports of sexual abuse involving the suspected perpetrator.

The Auditor reviewed multiple administrative investigations where body worn camera footage was recovered and reviewed to assist in the investigation. The investigation files revealed that alleged victims, suspected perpetrators, and witnesses were interviewed, and that prior criminal and institutional records of the individual involved were examined. When conducting the interview with the investigator he stated that he would first collect the officers report and then speak to the officer. Then he would interview the victim, witnesses, and staff. He would review body camera footage and camera housing footage. Finally, he would interview the suspected perpetrator and then write his report. The investigator explained that he is responsible for collecting digital video and protecting the crime scene. The Virginia State Police is responsible for collecting direct evidence.

The evidence collected for this provision shows that the agency has procedures in place to ensure that CVRJ investigators collect circumstantial evidence and that the Virginia State Police collect direct evidence. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (d)

CVRJ Investigations Policy R-1.05, page 1, section A, paragraph 5, states in part that; No compelled interviews shall be conducted by the Jail. There are no examples of investigative reports supporting compelled statements. This practice is in violation of the agency's policy. When asked about compelling staff to answer questions the investigator explained that they do not conduct compelled interviews.

The evidence collected for this provision shows that the agency has procedures in place governing compelled interviews. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (e)

CVRJ Investigations Policy R-1.05, page 1, section A, paragraph 5, states in part that; the credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and will not be determined by the person's status as an inmate or staff. In addition, the jail will not require an inmate, who alleges sexual abuse, to submit to a polygraph examination or other truth telling devise as a condition for proceeding with the alleged allegation.

The investigator was interviewed and stated that he takes every allegation the same and handles them in a serious manner. The investigator also stated that polygraphs are not used to determine truthfulness in allegations of sexual abuse. The Auditor also conducted 3 interviews with inmates that reported sexual abuse. All 3 inmates were asked if the agency required them to take a polygraph as a condition for proceeding with a sexual abuse investigation. All 3 inmates stated no.

The evidence collected for this provision shows that the agency has procedures in place ensuring that an individual's credibility shall not be determined by the person's status as an inmate or staff. Furthermore, polygraph examinations will not be used as a condition for proceeding with the investigation of a sexual abuse allegation. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (f)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 8 & 9, states in part that; administrative investigations will include an effort to determine whether staff actions or failures

to act contributed to the abuse. In addition, all administrative investigations will be documented in written reports that include:

- Description of the physical and testimonial evidence
- The reasoning behind credibility assessments
- Investigative facts and findings

A sample of investigative files were reviewed during the document review phase and revealed that all the listed elements for a complete investigation was present in those files. When interviewing the investigator, he stated that to determine if staff actions contributed to a sexual abuse, he would review activity logs and make sure agency policy was followed. He also stated that witness statements, incident reports, circumstantial evidence, and findings would be found in an administrative investigation file.

The evidence collected for this provision shows that the agency has procedures in place to ensure efforts are made to determine if staff actions or failures contributed to a sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (g)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 10 & 11, states in part that; any allegation of sexual abuse that appears to be criminal will be referred to the Virginia State Police Bureau of Criminal Investigations for criminal investigation. In addition, the CVRJ shall request that the Virginia State Police follow the PREA standard 115.21 (a-f). The CVRJ has entered into an agreement with the Virginia State Police to conduct all criminal investigations that occur in that facility. The investigator confirmed this practice when asked if his agency conducts criminal investigations. He stated no, any criminal investigation is conducted by the Virginia State Police.

The evidence collected for this provision shows that the agency does not conduct criminal investigations. The Virginia State Police has that responsibility. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (h)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 10 & 11, states in part that; any allegation of sexual abuse that appears to be criminal will be referred to the Virginia State Police Bureau of Criminal Investigations for criminal investigation. In addition, the CVRJ shall request that the Virginia State Police follow the PREA standard 115.21 (a-f).

This provision is the responsibility of the Virginia State Police. Therefore, this provision is not applicable to the CVRJ. However, the agency did report that there were no criminal cases referred for prosecution over the last twelve months. The investigator confirmed this practice when asked if his agency conducts criminal investigations. He stated no, any criminal investigation is conducted by the Virginia State Police.

The evidence collected for this provision shows that the agency does not conduct criminal investigations. The Virginia State Police has that responsibility. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.71 Provision (i)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 12, states in part that; all written reports of administrative and criminal investigations will be retained by the jail for as long as the alleged abuser is incarcerated or is employed by the jail, plus five years. The Auditor reviewed investigative cases along with additional files provided during the pre-audit phase of this audit.

The evidence collected for this provision shows that the agency has procedures in place to ensure written investigative reports are retained for as long as the alleged abuser is

incarcerated or employed by the agency, plus five years. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.

115.71 Provision (j)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 13, states in part that; an investigation will not be terminated just because the alleged abuser or victim departs from employment or control of the Jail. The PREA investigator was asked how he would proceed when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation. The investigator explained that it had never happened before and would continue to investigate by collecting evidence and turning the investigation over to the state police.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative investigation continues regardless if the abuser or victim is no longer employed or under the agency's control. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

115.71 Provision (l)

CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 14, states in part that; CVRJ will cooperate with the Virginia State Police Bureau of Investigations and will remain informed about the progress of the investigation.

Interviews were conducted with the Warden/Designee, PREA Coordinator, PREA Compliance Manager, and Investigative staff about this provision. The PREA Coordinator, PREA Manager, and Warden/Designee were asked how the agency remain informed of the progress of a criminal sexual abuse case. The PREA Coordinator responded by saying it's very trying, and they contact the State Police and ask for updates. The PREA Manager stated through emails, phone calls, and the agency point of contact, the Superintendent. The Warden stated that they will follow up with the State Police to find out the status. The Agency Investigator was asked what role he plays in a criminal investigation. The investigator explained that he was the point of contact for setting up all staff and inmate interviews for the State Police.

The evidence collected for this provision shows that the agency has procedures in place to try and stay informed about ongoing criminal sexual abuse investigations being conducted by the Virginia State Police. Therefore, through written policy and interviews conducted the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring criminal and administrative agency investigations.

115.72	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Investigations Policy R-1.05</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Investigative Staff</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.72 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 2, section A, paragraph 15, states in part that; the Jail will not impose a standard higher than the preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The Agency Investigator was asked what standard of evidence he requires to substantiate allegations of sexual abuse or sexual harassment. The Investigator replied, “the preponderance of the evidence or 51% of the evidence suggests one way or the other”. In addition, the auditor reviewed investigative files and observed case findings.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual assault is substantiated. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring evidentiary standards for administrative investigations.</p>

115.73	<b>Reporting to inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Investigations Policy R-1.05</li> <li>c) CVRJ Allegation of Sexual Abuse – Report to Inmate</li> <li>d) Superintendent Memorandum dated 10/10/2019</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Warden or Designee</li> <li>b) Interview with Investigative Staff</li> <li>c) Interview with Inmates that reported sexual abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.73 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 3, section A, paragraph 16, states in part that; following an administrative and/or criminal investigation into allegations of sexual abuse, the inmate will be informed whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.</p> <p>The agency reported 5 investigations of alleged sexual abuse during the last twelve months that were completed by the agency. Of those 5 investigations 3 investigative files contained findings. When asked about the other two cases the PREA Compliance Manager explained that one case consisted of receiving an anonymous letter that he later determined to be a prank and therefore, there was no one to report to. The second case involved an allegation made while the inmate was at the hospital. The inmate was then released directly from the hospital and given contact information for the facility to further the investigation. However, the individual never contacted the facility.</p> <p>During the interview with the investigative staff, the investigator stated that his agency procedures requires him to notify the inmate of the investigative findings. He stated that the finding is put into the report and the inmate is told and given an Allegation of Sexual Abuse Report to Inmate form that has the findings marked on the form. This document is relatively new. The Warden/Designee stated that yes, notification is made to the inmate as to the findings of his/her allegation. And that the notification is usually done by the investigator. The information is also documented in the case file. Lastly, three inmates who reported sexual abuse were interviewed. One inmate stated that he/she had been notified, but the other two stated that no one ever came back to them to inform them of the investigative findings.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to inform the inmates who allege sexual abuse of the findings of the investigation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.73 Provision (b)</p> <p>In the past twelve months the agency has reported one incident where an inmate alleged sexual abuse and was investigated and completed by the Virginia State Police. The investigation was forwarded to the State Police on 01/30/2019. The State Police informed the facility on 02/27/2019 that the case was unfounded and closed. The inmate was then</p>

subsequently informed of the findings.

The evidence collected for this provision shows that the agency has procedures in place to ensure that when an investigation is completed by an outside agency the inmate is informed of the findings. Therefore, through document review the agency has demonstrated that it meets this provision.

#### 115.73 Provision (c)

CVRJ Investigations Policy R-1.05, page 3, section A, paragraph 17, states in part that; following an inmate's allegation that a staff member committed sexual abuse against the inmate, the Jail will inform the inmate (unless the Jail has determined the allegation is unfounded) whenever:

- The staff member is no longer posted within the inmate's housing unit.
- The staff member is no longer employed at the Jail.
- The Jail learns that the staff member has been indicted on a charge related to sexual abuse within the Jail.
- The Jail learns that the staff member has been convicted on a charge related to sexual abuse within the Jail.

The agency has provided a memorandum dated 10/10/2019 from the Superintendent stating that there have been no sexual abuse allegations involving staff or inmates that have been referred to criminal prosecution. The inmates interviewed that reported sexual abuse did not involve a staff member.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged staff perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.73 Provision (d)

CVRJ Investigations Policy R-1.05, page 3, section A, paragraph 18, states in part that; following an inmate's allegation that another inmate has sexually abused them, the Jail will inform the alleged victim whenever:

- The Jail learns that the alleged abuser has been indicted on a charge related to sexual abuse within the Jail.
- The Jail learns that the alleged abuser has been convicted on a charge related to sexual abuse within the Jail.

The agency has provided a memorandum dated 10/10/2019 from the Superintendent stating that there have been no sexual abuse allegations involving staff or inmates that have been referred to criminal prosecution. The inmates interviewed that reported sexual abuse stated that they had not been informed of any pending criminal proceedings.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged inmate sexual perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.73 Provision (e)

CVRJ Investigations Policy R-1.05, page 3, section A, paragraph 19, states in part that; all notifications and attempted notifications will be documented.

The agency has provided a memorandum dated 10/10/2019 from the Superintendent stating that there have been no sexual abuse allegations involving staff or inmates that have been referred to criminal prosecution.

The evidence collected for this provision shows that the agency has procedures in place to

ensure all notifications and attempted notifications are documented. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

**Conclusion:**

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring reporting to inmates.

115.76	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) CVRJ Agency Pre-Audit Questionnaire Responses</p> <p>b) CVRJ Agency PREA Investigations Policy R-1.05</p> <p>Interviews:</p> <p>Observations made during the on-site audit and document review.</p> <p>115.76 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 1, states in part that; CVRJ staff will be subject to disciplinary sanctions up to and including termination for violating the sexual abuse and sexual harassment policies.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure staff will be subject to disciplinary actions for violating the agency's sexual abuse and sexual harassment policies. Therefore, through written policy the agency has demonstrated that it meets this provision.</p> <p>115.76 Provision (b)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 2, states in part that; staff that has engaged in sexual abuse will be terminated from the CVRJ. There have been no substantiated cases involving staff violating the agency's sexual abuse or sexual harassment policies. And no staff has been terminated based on PREA violations in the past twelve months.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that termination should be the presumptive disciplinary action for staff who have engaged in sexual abuse. Therefore, through written policy agency has demonstrated that it meets this provision.</p> <p>115.76 Provision (c)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 3, states in part that; other disciplinary sanctions for violating the sexual abuse or sexual harassment policy that does not include engaging in sexual abuse will be based on the following:</p> <ul style="list-style-type: none"> <li>• The nature and circumstances of the acts committed.</li> <li>• The Staff Member's disciplinary history.</li> <li>• The sanctions imposed for similar offenses by other staff with similar histories.</li> </ul> <p>The agency reported that there have been no staff disciplined for any PREA related allegations associated with sexual abuse or sexual harassment in the last twelve months. The evidence collected for this provision shows that the agency has procedures in place to discipline staff who violate sexual abuse or sexual harassment policies, but do not engage in sexual abuse. Therefore, through written policy and document review agency has demonstrated that it meets this provision.</p> <p>115.76 Provision (d)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 4, states in part that; all terminations or resignations for violations of the Jail's sexual abuse or sexual harassment policy will be reported to the Virginia State Police unless the activity was not criminal. The CVRJ reported that no staff member has been terminated for PREA policy violations and</p>

therefore, the Virginia State has not been contacted for that purpose.

The evidence collected for this provision shows that the agency has procedures to contact the Virginia State Police when a staff member is terminated or resigns due to an alleged violation of the agency's sexual abuse or sexual harassment policies. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring disciplinary sanctions for staff. No corrective action necessary.

115.77	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Investigations Policy R-1.05</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with the Warden/Designee</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.77 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 5, states in part that; any contractor or volunteer who engages in sexual abuse will be prohibited from contact with inmates and will be reported to the Virginia State Police unless the activity is not criminal. The agency reported that there have been no substantiated cases involving contractors or volunteers violating the agency’s sexual abuse or sexual harassment policies. And no volunteer or contractor has been restricted from contact with inmates based on PREA violations in the past twelve months.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure volunteers or contractors who engage in sexual abuse do not have contact with inmates. In addition, when allegations of sexual abuse are alleged, the State Police is notified. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.</p> <p>115.77 Provision (b)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 6, states in part that; in case of any other violation of agency sexual abuse or sexual harassment policy by a contractor or volunteer, the Jail will consider whether to prohibit further contact with inmates. The agency reported that there have been no substantiated cases or reports involving contractors or volunteers violating the agency’s sexual abuse or sexual harassment policies. And no volunteer or contractor has been restricted from contact with inmates based on PREA violations in the past twelve months.</p> <p>The Auditor interviewed the Warden/Designee and he stated that if a contractor or volunteer was accused of violating the agency’s sexual abuse or sexual harassment policy that individual could no longer stay. If it was determined that the allegation was substantiated, the contractor or volunteer would no longer have access to the facility and the Virginia State Police would be contacted.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address actions to be taken when a contractor or volunteer violates agency’s PREA policies but does not engage in sexual abuse of an inmate. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring corrective action for contractors and volunteers. No corrective action necessary.</p>



115.78	<b>Disciplinary sanctions for inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) CVRJ Agency Pre-Audit Questionnaire Responses</p> <p>b) CVRJ Agency PREA Investigations Policy R-1.05</p> <p>Interviews:</p> <p>a) Interview with the Warden/Designee</p> <p>Observations made during the on-site audit and document review.</p> <p>115.78 Provision (a)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 7, states in part that; inmates will be subject to disciplinary sanctions through a formal disciplinary process following:</p> <ul style="list-style-type: none"> <li>• An administrative finding that the inmate engaged in inmate-on-inmate sexual abuse.</li> <li>• Following a criminal finding of guilt for inmate-on-inmate sexual abuse.</li> </ul> <p>In the past twelve months the agency has reported that there has been no inmate-on-inmate sexual abuse at the facility and no criminal findings of guilt.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates are subject to disciplinary sanctions following a finding that the inmate engaged in inmate-on-inmate sexual abuse. Therefore, through written policy and document review the agency has demonstrated that it meets this provision.</p> <p>115.78 Provision (b) &amp; (c)</p> <p>CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 8, states in part that; inmate disciplinary sanctions will take in consideration the following:</p> <ul style="list-style-type: none"> <li>The nature and circumstances of the abuse committed</li> <li>The inmate’s disciplinary history</li> <li>The sanctions imposed for similar offenses by other inmates with similar histories</li> <li>The inmate’s mental disabilities or mental illness</li> </ul> <p>When conducting the interview with the Warden/Designee, he was asked what disciplinary sanctions inmates are subject to following an investigation that found the inmate had engaged in inmate-on-inmate sexual abuse. And is mental illness considered when determining sanctions. The Warden/Designee stated that the maximum in-house charge could result in 15 days of disciplinary segregation, but the punishment would be determined on the severity of the violation. He also stated that the mental illness part would be considered on the front end, deciding if the inmate should be charged in the first place due to his/her disability.</p> <p>The evidence collected for these provisions shows that the agency has procedures in place to discipline those inmates who have been found responsible for engaging in inmate-on-inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.78 Provision (d)</p> <p>The CVRJ does not offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. During interviews with both medical and mental health practitioners, they confirmed that they do not offer those services.</p> <p>115.78 Provision (e)</p>

CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 9, states in part that; the Jail will discipline an inmate for sexual contact with staff only upon finding that the staff member did not consent to such contact.

The agency did provide an investigation along with the disciplinary hearing findings as an example of an incident where an inmate was disciplined based on this policy. The incident and report were over two years old. However, the example does provide proof that the agency has and will follow policy related to this provision.

The evidence collected for this provision shows that the agency has procedures in place to discipline those inmates who have engaged in sexual abuse against staff members.

Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.78 Provision (f)

CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 10, states in part that; an inmate's of sexual abuse made in good faith and based on reasonable belief will not be disciplined for falsely reporting an incident or lying, even I the investigation does not establish evidence sufficient to substantiate the allegation. The agency has found many of their investigations as unsubstantiated or unfounded and did not discipline any inmate for bringing those allegations forward in good faith.

The evidence collected for this provision shows that the agency has procedures in place to prohibit those inmates that report sexual abuse or sexual harassment in good faith be disciplined regardless of the investigative findings. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### 115.78 Provision (g)

CVRJ Investigations Policy R-1.05, page 4, section B, paragraph 11&12, states in part that; CVRJ prohibits all sexual activity between inmates and will discipline inmates for any such activities. In addition, the CVRJ will not deem the activity as sexual abuse if it was not coerced. The evidence collected for this provision shows that the agency has procedures in place to prohibit any type of sexual activity between inmates and will discipline inmates for those activities. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring disciplinary sanctions for inmates. No corrective action necessary.

115.81	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Medical &amp; Mental Health Care Policy R-1.06</li> <li>c) CVRJ Medical Assessment Form</li> <li>d) CVRJ Mental Health Assessment Form</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff Responsible for Risk Screening</li> <li>b) Interviews with Medical &amp; Mental Health Staff</li> <li>c) Interviews with Inmates who disclose Sexual Victimization during Risk Screening</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.81 Provision (a) &amp; (c)</p> <p>CVRJ Medical &amp; Mental Health Policy R-1.06, page 1, section A, paragraph 1, states in part that; if the intake screening indicates that a jail inmate has experienced prior sexual victimization or indicates that an inmate has previously been the subject of sexual abuse in either an institutional setting or in the community then that inmate will be offered a follow-up meeting with medical or mental health within 14 days.</p> <p>The CVRJ medical, and more so mental health professionals, use an assessment tool specific to each profession. In those assessments' notes are generated about completing a 14-day review due to disclosing previous sexual victimization. The agency has provided examples of these assessments as proof of compliance.</p> <p>When conducting the interview with the staff member who is responsible for risk screening, he stated that all inmates that are classified have to be medically evaluated and speak with a mental health professional before a housing assignment is generated. When interviewing those inmates that have reported prior sexual victimization all of the inmates reported that when they informed staff about their previous victimization a follow-up meeting with a medical or a mental health professional was offered.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization are offered a follow-up meeting with medical or mental health professionals within 14 days of intake. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.81 Provision (b)</p> <p>This facility is a local Regional Jail holding both pre-trial detainees and sentenced inmates. This facility is not a prison. Therefore, this provision is not applicable to this CVRJ Investigations Policy R-1.05, page 4, facility.</p> <p>115.81 Provision (d)</p> <p>CVRJ Medical &amp; Mental Health Policy R-1.06, page 1, section A, paragraph 3, states in part that; all information related to sexual victimization and/or abusiveness that occurred in an institutional setting shall be strictly limited to medical, mental health staff, and any other staff on a need to know basis.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to</p>

ensure that reported sexual victimization that occurred in a confinement setting is strictly limited to selected professionals. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

115.81 Provision (e)

CVRJ Medical & Mental Health Policy R-1.06, page 1, section A, paragraph 4, states in part that; medical and mental health personnel will obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

Personnel from both medical and mental health were asked if they obtain informed consent from inmates before reporting about prior sexual victimization. In addition, they were asked how they would handle inmates under the age 18 years old. The medical staff member stated that she would ask for consent and document the conversation. The mental health professional stated that he has everyone sign their consent prior to having any conversations. Both professionals stated that they do not encounter juveniles and therefore they have never experienced that situation. However, both professionals were aware of the state of Virginia's mandatory reporting laws involving juveniles.

The evidence collected for this provision shows that the agency has procedures in place to ensure informed consent is obtained from inmates before medical and mental health staff can report those incidents if the sexual victimization did not occur in a confinement setting.

Therefore, through written policy, document review and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring a medical and mental health screening; history of sexual abuse.

115.82	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Medical &amp; Mental Health Care Policy R-1.06</li> <li>c) Nursing Log Notes</li> <li>d) Memorandum of Understanding between the CVRJ and University of Virginia Hospital (SANE)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Staff Responsible for Risk Screening</li> <li>b) Interviews with Medical &amp; Mental Health Staff</li> <li>c) Interviews with Inmates who Reported a Sexual Abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.82 Provision (a)</p> <p>CVRJ Medical &amp; Mental Health Policy R-1.06, page 1, section A, paragraph 5, states in part that; all inmates of sexual abuse will receive timely and unimpeded access to emergency medical treatment and crisis intervention services.</p> <p>Medical and mental health staff members were interviewed and asked if inmates that were victims of sexual abuse receive immediate and unimpeded emergency medical care and both answered that they do. In addition, they stated that the nature and scope of the treatment is at their professional discretion. The inmates who reported sexual abuse were asked if they had an opportunity to see a medical or mental health doctor/nurse in a timely manner. One inmate stated that he did but chose not to see one. One inmate stated that he sees the mental health doctor on a regular basis, and the last inmate advised that she never was asked.</p> <p>CVRJ medical and mental health professionals use an assessment tool specific to each profession. In those assessments' notes are generated about completing a 14-day review due to disclosing previous sexual victimization. The agency has provided examples of these assessments as proof of compliance.</p> <p>When conducting the interview with the staff member who is responsible for risk screening he stated that all inmates that are classified must be medically evaluated and speak with a mental health professional before a housing assignment is generated. When interviewing those inmates that have reported prior sexual victimization, all inmates reported that when they informed staff about their previous victimization a follow-up meeting with a medical or a mental health professional was offered.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization is offered a follow-up meeting with medical or mental health professionals within 14 days of intake. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.82 Provision (b)</p> <p>Interviews were conducted with 12 random staff. Of those staff interviewed 11 staff members stated that they would immediately remove the inmate from the situation, block, or housing unit. When interviewing a first responder he explained that he would make the scene safe,</p>

report to a supervisor, preserve evidence, contact medical personnel, write a report, and protect the crime scene. If medical personnel are not available then the facility contacts the local rescue emergency services for assistance.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse is offered immediate medical and mental health services when no qualified medical and mental health personnel is available. Therefore, through interviews conducted the agency has demonstrated that it meets this provision.

#### 115.82 Provision (c)

CVRJ Medical & Mental Health Policy R-1.06, page 2, section A, paragraph 6, states in part that; any inmate victim of sexual abuse which occurs while in Jail will be offered information and access to emergency contraception and sexually transmitted infections prophylaxis in accordance with professionally accepted standards or care, where medically appropriate. The CVRJ has entered into a MOU with the UVA Hospital Forensics Unit to provide these services. The MOU specifically outlines that the UVA Forensics Unit will offer information, timely access to emergency contraception and sexually transmitted infections prophylaxis. When conducting interviews with medical and mental health staff it was disclosed that yes, the SANE Nurse at the UVA Forensics Unit offers it.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates are offered information and access to emergency contraception and sexually transmitted infections prophylaxis after allegations of sexual abuse. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.82 Provision (d)

CVRJ Medical & Mental Health Policy R-1.06, page 3, section A, paragraph 16, states in part that; all treatment services for sexual abuse will be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse do not incur any financial responsibility due to a sexual abuse allegation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring access to emergency medical and mental health services.

115.83	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ Agency PREA Medical &amp; Mental Health Care Policy R-1.06</li> <li>c) Memorandum of Understanding between the CVRJ and University of Virginia Hospital (SANE)</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interviews with Medical &amp; Mental Health Staff</li> <li>b) Interviews with Inmates who Reported a Sexual Abuse</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.83 Provision (a) &amp; (b)</p> <p>CVRJ Medical &amp; Mental Health Policy R-1.06, page 2, section A, paragraph 7, states in part that; the Jail will offer medical and mental health evaluation and necessary treatment to all inmates who have been victimized by sexual abuse in any Prison, Jail, or Lockup. The evaluation and treatment of such victims will include:</p> <ul style="list-style-type: none"> <li>Follow up services</li> <li>Treatment plans</li> <li>Referrals for continued care following their transfer or release</li> </ul> <p>The interviews conducted revealed that medical staff would not take the lead on treatment and would consult with the SANE Nurse. Medical staff stated that the treatment should be individualized based on the type of injury. The mental health staff stated that he had not experienced this situation. However, the Community Services Board would always be offered to provide continued care. The 3 inmates interviewed who reported sexual abuse did not require continued care.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure the facility offer medical and mental health evaluation and treatment to all inmates who have been sexually victimized. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.83 Provision (c)</p> <p>Interviews were conducted with medical and mental health staff. Those interviews revealed that the staff believes that the service is better due to the immediate access. Also, the local Community Services Board provides the mental health services provided in the Jail, which is the exact department that offers services for the community.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates receive medical and mental health services consistent with the community level of care. Therefore, through interviews conducted the agency has demonstrated that it meets this provision.</p> <p>115.83 Provision (d) &amp; (e)</p> <p>CVRJ Medical &amp; Mental Health Policy R-1.06, page 2 &amp; 3, section A, paragraph 13 &amp;14, states in part that; inmate victims of unwanted vaginal penetration while in the Jail will be offered pregnancy tests. In addition, inmate victims who become pregnant while in Jail will receive comprehensive information about all lawful pregnancy related medical services. There have</p>

been no incidents of this nature at this facility over the last twelve months.

The CVRJ has entered into a MOU with the UVA Hospital Forensics Unit to provide these services. The MOU specifically outlines that the UVA Forensics Unit will offer information, timely access to emergency contraception and prophylaxis treatment for sexually transmitted infections.

When conducting interviews with medical and mental health staff it was revealed that yes, the SANE Nurse at the UVA Forensics Unit offers this service. In addition, the facility agrees to make the inmate available for further future appointments with the UVA Forensics Unit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of vaginal penetration are offered pregnancy tests along with timely information about access to all lawful pregnancy-related medical services.

Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.83 Provision (f)

CVRJ Medical & Mental Health Policy R-1.06, page 3, section A, paragraph 15, states in part that; inmate victims of sexual abuse while in the Jail will be offered tests for sexually transmitted infections as medically appropriate. There have been no incidents of this nature at this facility over the last twelve months.

The CVRJ has entered into a MOU with the UVA Hospital Forensics Unit to provide these services. The MOU specifically outlines that the UVA Forensics Unit will offer information, timely access to emergency contraception and prophylaxis treatment for sexually transmitted infections.

When conducting interviews with medical and mental health staff it was revealed that yes, the SANE Nurse at the UVA Forensics Unit offers this service. In addition, the facility agrees to make the inmate available for further future appointments with the UVA Forensics Unit.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of sexual abuse is offered tests for sexually transmitted infections as appropriate. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.83 Provision (g)

CVRJ Medical & Mental Health Policy R-1.06, page 3, section A, paragraph 16, states in part that; all treatment services for sexual abuse will be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse do not incur any financial responsibility due to a sexual abuse allegation. Therefore, through written policy the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring ongoing medical and mental health care for sexual abuse victims and abusers.

115.86	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Investigations Policy R-1.05</li> <li>c) Incident Review Meeting Notes</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with the Warden/Designee</li> <li>b) Interview with the PREA Compliance Manager</li> <li>c) Interview with the Incident Review Team Member</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.86 Provision (a) &amp; (b)</p> <p>CVRJ Investigation Policy R-1.05, page 5, section C, paragraph 1, states in part that; a sexual abuse incident review will be conducted within 30 days after the conclusion of every sexual abuse investigation unless the allegation has been determined to be unfounded. The facility reported one incident in the past twelve months of an administrative investigation of alleged sexual abuse that resulted in an incident review. This incident review was documented and provided as evidence of compliance for these provisions. After reviewing the documentation, the review was conducted and completed two days after the conclusion of the investigation. The evidence collected for these provisions shows that the agency has procedures in place to ensure that an incident review is conducted after every sexual abuse investigation exuding those that are unfounded. In addition, the incident review shall occur within 30 days of the conclusion of the investigation. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.86 Provision (c)</p> <p>CVRJ Investigation Policy R-1.05, page 5, section C, paragraph 2, states in part that; the review team will consist of upper level management officials, supervisors, investigators, and medical/mental health personnel.</p> <p>The incident review provided the one incident as proof of a team consisting of a Mental Health Practitioner, the PREA Coordinator, the PREA Compliance Manager, and the Major (Chief of Inmate Services).</p> <p>In the interview with the Warden/Designee he stated that the agency does utilize an incident review team and the input from these individuals are considered, and many times part of the team review, depending on the situation.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that the review team is made up of upper level management, supervisors, investigators, and medical/mental health staff. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.86 Provision (d) &amp; (e)</p> <p>CVRJ Investigation Policy R-1.05, page 6, section C, paragraph 3, states in part that; the review team will consider the following:</p> <ul style="list-style-type: none"> <li>A need to change policy or practice to better prevent, detect, or respond to sexual abuse.</li> </ul>

If the incident or allegation was motivated by race, ethnicity, gender, identity, LGBT identification, status, perceived status, gang affiliation.

The area in the Jail where the alleged incident occurred to assess whether physical barriers in the area may permit abuse.

The adequacy of staffing levels in that area during different shifts.

Whether monitoring technology should be deployed or augmented to support supervision by staff.

The review team will prepare a report of the findings, determinations, and any recommendations for improvement and submit that report to the Superintendent and PREA Coordinator.

The Jail will implement the review team's recommendations for improvements or will document the reasons for not doing so.

The facility provided evidence of a 30-day incident review meeting minutes that suggests this practice was followed. In those minutes, the review team recommended to the Colonel of the facility to add cameras to the facility housing units. These recommendations were implemented during the remodel of north side housing units and are scheduled to be completed in G and H-Block during their renovation.

Interviews with the Warden/Designee, Incident Review Team Member, and PREA Compliance Manager all revealed that these topics are considered and discussed during the review.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the incident review team considers all the above listed criteria when convening their meetings. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring sexual abuse incident reviews.

115.87	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Investigations Policy R-1.05</li> <li>c) Agency Copies of prior Survey of Sexual Victimization reports (SSV)</li> <li>d) Copies of the last three years of the CVRJ PREA Annual Report</li> </ul> <p>Interviews:</p> <p>Observations made during the on-site audit and document review.</p> <p>115.87 Provision (a) &amp; (c)</p> <p>CVRJ Investigation Policy R-1.05, page 6, section C, paragraph 4, states in part that; the Jail will annually collect accurate uniform data for every allegation of sexual abuse necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p>The facility reported that their collection instrument is based directly off the SSV. The facility also provided the last three years of their agency form documenting the information relied upon to complete the SSV for the Department of Justice Bureau of Justice Statistics.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to collect accurate uniform data for every allegation of sexual abuse. The data collected is used to complete the federal mandated Survey of Sexual Violence questionnaire. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.87 Provision (b)</p> <p>CVRJ Investigation Policy R-1.05, page 6, section C, paragraph 5, states in part that; upon request the Jail will provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>The facility has provided the last three years' worth of PREA annual reports containing comparisons of the current years data and corrective actions from the previous years assessment of the agency's progress.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency will aggregate the incident based sexual abuse data annually. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.87 Provision (d)</p> <p>CVRJ Investigation Policy R-1.05, page 6, section C, paragraph 4, states in part that; the Jail will annually collect accurate uniform data for every allegation of sexual abuse necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p>The facility has provided the last three years' worth of collected data used to complete and submit the SSV for the Department of Justice Bureau of Justice Statistics.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to maintain, review, and collect data ensure that the incident review team consider all the above</p>

listed available incident-based documents. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

115.87 Provision (e)

This provision is not applicable to this facility because the agency does not contract for the confinement of its inmates.

115.87 Provision (f)

CVRJ Investigation Policy R-1.05, page 6, section C, paragraph 5, states in part that; upon request the Jail will provide all such data from the previous calendar year to the Department of Justice no later than June 30.

The facility has provided the last three years' worth of collected data used to complete and submit the SSV for the Department of Justice Bureau of Justice Statistics.

The evidence collected for this provision shows that the agency has procedures in place to submit their annual SSV report to the Department of Justice. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Data Collection.

115.88	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Investigations Policy R-1.05</li> <li>c) Copies of the last three years of Corrective Action Plans</li> <li>d) Copies of the last three years of CVRJ PREA Annual Reports</li> <li>e) The Central Virginia Regional Jail Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with Agency Head</li> <li>b) Interview with PREA Coordinator</li> <li>c) Interview with PREA Compliance Manager</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.88 Provision (a)</p> <p>CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 6, states in part that; the Jail will review data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices and training, including:</p> <ul style="list-style-type: none"> <li>Identifying problem areas</li> <li>Taking corrective action on an ongoing basis: and</li> <li>Preparing an annual report of its findings and corrective actions for the Jail as a whole</li> </ul> <p>The facility has provided the last three years of their Corrective Action Plans as evidence to support compliance with this provision. The reports include all of the above elements outlined in this provision. Interviews conducted with the Agency Head, PREA Coordinator and PREA Compliance Manager confirmed that an annual report is generated to assess and improve the effectiveness of the agency’s prevention, detection, and response to sexual abuse. The PREA Manager stated that the report was used to justify additional cameras throughout the facility. The evidence collected for this provision shows that the agency has procedures in place to review data collected to better assess and improve the effectiveness of its sexual abuse policies. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.88 Provision (b)</p> <p>CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 7, states in part that; the Jails report shall include a comparison for the current years data and corrective actions with those from the prior years and shall provide an assessment of the Jail’s progress in addressing sexual abuse.</p> <p>The facility has provided the last three years’ worth of PREA annual reports containing comparisons of the current years data and corrective actions from the previous years assessment of the agency’s progress.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency provides prior year comparisons in its yearly PREA annual report. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.88 Provision (c)</p>

CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 8, states in part that; the Superintendent will make the report readily available to the public through the Jail's website excluding all personnel identifiers after final approval.

The facility has posted the last three years of PREA Annual Reports on their website. This is a public website that provides access to those reports. The PREA Compliance Manager and Superintendent must sign off on the report prior to publication. This procedure is corroborated by the evidence of the signatures present on the signature page of the PREA Annual Reports. During the interview with the Agency Head he confirmed, that yes, he must have final approval before making the document public.

The evidence collected for this provision shows that the agency has procedures in place to make the PREA Annual Report public by posting to their website and that the Superintendent must have final approval. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### 115.88 Provision (d)

CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 9, states in part that; the Jail may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the Jail, but must indicate the nature of the material redacted.

The facility reported that the only information redacted from the annual reports are the names of the individuals involved and that there has been no material redacted. The PREA Coordinator stated during his interview that only personal identifiers and threats to safety and security would be the only reasons to redact information from the PREA Annual Report. The evidence collected for this provision shows that the agency has procedures in place to redact only specific information from the PREA Annual Report. Therefore, through written policy, document review, and interviews conducted, the agency has demonstrated that it meets this provision.

#### Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the agency is fully compliant with this standard requiring Data review for corrective action.

115.89	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> <li>a) CVRJ Agency Pre-Audit Questionnaire Responses</li> <li>b) CVRJ PREA Investigations Policy R-1.05</li> <li>c) Copies of the last three years of Corrective Action Plans</li> <li>d) Copies of the last three years of CVRJ PREA Annual Reports</li> <li>e) The Central Virginia Regional Jail Website</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>a) Interview with PREA Coordinator</li> </ul> <p>Observations made during the on-site audit and document review.</p> <p>115.89 Provision (a)</p> <p>CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 10, states in part that; the Jail will ensure all data is securely retained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p>The PREA Coordinator was interviewed and asked how the agency ensures that the data collected is securely retained. The Coordinator stated that everything is stored in the PREA Compliance Manager’s office in a locked filing cabinet.</p> <p>The evidence collected for this provision shows that the agency has a procedure in place to secure collected data regarding sexual abuse allegations. Therefore, through written policy and interviews conducted, the agency has demonstrated that it meets this provision.</p> <p>115.89 Provision (b) &amp;(c)</p> <p>CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 8, states in part that; the Superintendent will make the report readily available to the public through the Jail’s website excluding all personnel identifiers after final approval.</p> <p>The facility has posted the last three years of PREA Annual Reports on their website. This is a public website that provides access to those reports. These reports can be viewed by going to the agency’s website.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to make the PREA Annual Report public by posting to their website and that all personal identifiers are redacted prior to publication. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>115.89 Provision (d)</p> <p>CVRJ Investigation Policy R-1.05, page 7, section C, paragraph 10, states in part that; the Jail will ensure all data is securely retained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise. The Auditor has reviewed historical sexual abuse information during this audit.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure sexual abuse data is retained for at least 10 years after the date of the initial collection. Therefore, through written policy and document review, the agency has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has</p>

determined that the agency is fully compliant with this standard requiring data storage, publication, and destruction. No corrective action necessary.

115.401	Frequency and scope of audits
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>This is the Central Virginia Regional Jail's second PREA Audit. The initial audit was conducted in November of 2016. At that time, the facility met 36 PREA standards and exceeded in 8 standards. There was no corrective action necessary during the 2016 audit.</p> <p>The Auditor was provided full access to and observed all areas of the facility without obstruction. The Auditor received any and all requested documents or copies of relevant materials. The Auditor also was permitted to conduct all interviews in a private setting with both inmates and staff. Finally, the inmates were permitted to send the Auditor confidential correspondence in the same manner that legal mail would be handled. This topic was discussed and written into the contract prior to the audit.</p>

115.403	Audit contents and findings
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Central Virginia Regional Jail has posted the 2016 PREA Audit on the website. Therefore, evidence would suggest that this would happen once again after receiving the 2019 PREA audit final report.</p>

## Appendix: Provision Findings

115.11 (a)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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)	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na

115.12 (a)	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na

<b>115.13 (a)</b>	<b>Supervision and monitoring</b>	
	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	yes

	video monitoring, does the staffing plan take into 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

<b>115.13 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na

<b>115.13 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	Youthful inmates	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.14 (b)	Youthful inmates	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.14 (c)	Youthful inmates	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na

115.15 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes

115.15 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes

115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes

115.15 (d)	<b>Limits to cross-gender viewing and searches</b>	
	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)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes

115.15 (f)	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.16 (a)	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all	yes

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

	through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	
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<b>115.16 (b)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes

<b>115.16 (c)</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>	
	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)	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes

115.17 (b)	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	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

<b>115.17 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

<b>115.17 (h)</b>	<b>Hiring and promotion decisions</b>	
	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

<b>115.18 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	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

<b>115.18 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes

115.21 (a)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na

115.21 (c)	<b>Evidence protocol and forensic medical examinations</b>	
	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)?	no
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes

115.21 (d)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Evidence protocol and forensic medical examinations</b>	
	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)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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)	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	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)	<b>Policies to ensure referrals of allegations for investigations</b>	
	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).)	no

115.31 (a)	<b>Employee training</b>	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

115.31 (b)	<b>Employee training</b>	
	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?	no

115.31 (c)	<b>Employee training</b>	
	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)	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes

115.32 (a)	<b>Volunteer and contractor training</b>	
	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)	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes

<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

<b>115.33 (a)</b>	<b>Inmate education</b>	
	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

<b>115.33 (b)</b>	<b>Inmate education</b>	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	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

<b>115.33 (c)</b>	<b>Inmate education</b>	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes

115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.34 (b)	<b>Specialized training: Investigations</b>	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

115.34 (c)	<b>Specialized training: Investigations</b>	
	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)	<b>Specialized training: Medical and mental health care</b>	
	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)	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na

115.35 (c)	<b>Specialized training: Medical and mental health care</b>	
	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)	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes

115.41 (a)	<b>Screening for risk of victimization and abusiveness</b>	
	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)	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

115.41 (c)	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

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

115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes

115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes

115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

<b>115.41 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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

<b>115.42 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes

<b>115.42 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes

115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes

115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes

115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes

115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes

115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes

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

115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	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 and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na

115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes

115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes

115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes

115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na

115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na

115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	na
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	na
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	na

115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	na
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	na
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	na

115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	na
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na

115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na

115.53 (a)	<b>Inmate access to outside confidential support services</b>	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes

115.53 (b)	<b>Inmate access to outside confidential support services</b>	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes

115.53 (c)	<b>Inmate access to outside confidential support services</b>	
	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)	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes

115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes

115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes

115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes

115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	no

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	
	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

<b>115.62 (a)</b>	<b>Agency protection duties</b>	
	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

<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	
	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

<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes

<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	
	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

<b>115.66 (a)</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no

<b>115.67 (a)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.67 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes

115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	
	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

<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	
	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

<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes

<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes

<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes

<b>115.71 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.71 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	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

<b>115.72 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	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

<b>115.73 (a)</b>	<b>Reporting to inmates</b>	
	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

<b>115.73 (b)</b>	<b>Reporting to inmates</b>	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

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

<b>115.73 (e)</b>	<b>Reporting to inmates</b>	
	Does the agency document all such notifications or attempted notifications?	yes

<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes

<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	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

<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	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)	<b>Corrective action for contractors and volunteers</b>	
	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)	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes

115.78 (a)	<b>Disciplinary sanctions for inmates</b>	
	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)	<b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes

115.78 (c)	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (d)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	no

<b>115.78 (e)</b>	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (f)</b>	<b>Disciplinary sanctions for inmates</b>	
	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

<b>115.78 (g)</b>	<b>Disciplinary sanctions for inmates</b>	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes

<b>115.81 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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?	yes

<b>115.81 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	na

<b>115.81 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes

<b>115.81 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.81 (e)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	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

<b>115.82 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Access to emergency medical and mental health services</b>	
	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)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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)	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes

<b>115.83 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes

<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes

<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes

<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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

<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes

<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes

<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	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)	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes

115.86 (e)	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	<b>Data collection</b>	
	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)	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

<b>115.87 (c)</b>	<b>Data collection</b>	
	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

<b>115.87 (d)</b>	<b>Data collection</b>	
	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

<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na

<b>115.87 (f)</b>	<b>Data collection</b>	
	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

<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	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

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes

<b>115.88 (c)</b>	<b>Data review for corrective action</b>	
	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

<b>115.88 (d)</b>	<b>Data review for corrective action</b>	
	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

<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes

<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

<b>115.89 (d)</b>	<b>Data storage, publication, and destruction</b>	
	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

<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.401 (b)</b>	<b>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.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	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

<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes

<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes

<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes

<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	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

<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes

# **Central Virginia Regional Jail**

## **2016 PREA Annual Report**

This report has been created in correspondence with Prison Rape Elimination Act (PREA) Standard 115.87 to assess and help further improve the effectiveness of its sexual abuse prevention, detection, response policies and training to include;

- ❖ Identifying problem areas
- ❖ Taking corrective action on an ongoing basis; and
- ❖ Preparing an annual report of its findings from its data review.

In 2016 the Central Virginia Regional Jail has adopted PREA and has enlisted a PREA Coordinator and a PREA Compliance Manager to help ensure a safe and secure culture amongst inmates and staff. Central Virginia Regional Jail has a zero-tolerance policy for all forms of sexual misconduct and holds inmates and staff accountable for their actions.

### **Facility Upgrades**

Central Virginia Regional Jail has undergone extensive renovations over the past year to include four new housing units, a segregation unit, a kitchen and a new booking/intake department. Each area has been equipped with the latest in digital recording equipment and the facility has purchased Axon body cameras to be worn by all security staff to further ensure the safety of officers and inmates.

### **Definitions:**

**Staff:** Facility employees, contractors, volunteers, and any other person providing services within the department

**Inmate:** Any person confined at the Central Virginia Regional Jail

**Unsubstantiated Allegation** - An allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

**Substantiated Allegation** - An allegation that was investigated and determined to have occurred.

**Unfounded Allegation** - An allegation that was investigated and determined not to have occurred.

<b>Allegation of Inmate-on-Inmate Sexual Harassment</b>		
	<b>2015</b>	<b>2016</b>
<b>Substantiated</b>	0	1
<b>Unsubstantiated</b>	0	1
<b>Unfounded</b>	0	0
<b>Total</b>	0	2

<b>Allegation of Inmate-on-Inmate Abusive Sexual Contact</b>		
	<b>2015</b>	<b>2016</b>
<b>Substantiated</b>	0	0
<b>Unsubstantiated</b>	0	0
<b>Unfounded</b>	0	3
<b>Total</b>	0	3

<b>Allegation of Staff Sexual Misconduct</b>		
	<b>2015</b>	<b>2016</b>
<b>Substantiated</b>	0	0
<b>Unsubstantiated</b>	0	0
<b>Unfounded</b>	0	0
<b>Total</b>	0	0

<b>Allegation of Staff Sexual Harassment</b>		
	<b>2015</b>	<b>2016</b>
<b>Substantiated</b>	<b>0</b>	<b>0</b>
<b>Unsubstantiated</b>	<b>0</b>	<b>0</b>
<b>Unfounded</b>	<b>0</b>	<b>1</b>
<b>Total</b>	<b>0</b>	<b>1</b>

Colonel Frank E. Dyer III, Superintendent

 12-5-16



# **Central Virginia Regional Jail**

## **2018 PREA Annual Report**

**(September 30<sup>th</sup>, 2017 - September 30<sup>th</sup>, 2018)**

This report has been created in accordance with the Prison Rape Elimination Act (PREA) Standard 115.87 to assess and help further improve the effectiveness of its sexual abuse prevention, detection, response policies and training to include;

- ❖ Identifying problem areas
- ❖ Taking corrective action on an ongoing basis; and
- ❖ Preparing an annual report of its findings from its data review

This is Central Virginia Regional Jail's (CVRJ's) third annual report. On November 23, 2016 CVRJ has become compliant with the Department of Justice's Prison and Jail Standards by passing an audit conducted by Daniel P. Grimes. There are 41 standards set forth that the facility must meet expectations on in order to pass the audit. Of those standards CVRJ exceeded expectations on 6 and met expectations on 35.

### **Training**

CVRJ currently has designated one PREA Coordinator and one PREA Compliance Manager to ensure its policy, practices and procedures are constantly monitored and meet the standards set forth. All security staff, volunteers and contractors are trained on PREA and informed of the facilities zero-tolerance policy. CVRJ also has specially trained investigators in responding to incidents of sexual abuse which are comprised of all shift supervisors and various security staff. Investigator training is also offered to all CVRJ security staff that request to participate. Upon the classification process all inmates are provided information on how to report sexual abuse through multiple means to include anonymously, through a request form, through third party, verbally and through the PREA hotline. Inmates are also informed of the facilities zero-tolerance policy.

### **Facility Upgrades**

The facility has purchased more body cameras which are worn by staff to record all interactions with inmates. These cameras have proven to be a deterrent of false

accusations made against staff and allowed investigators to make accurate decisions in their findings. The facility has also hired a full time Chaplain and increased programming that is offered to inmates. A full time Mental Health Clinician has also been hired to further serve the mental health needs of its inmates. All inmates who have prior history of sexual abuse are afforded the opportunity to meet with the Mental Health Clinician.

### **Data and Statistics**

It is the policy of CVRJ that all verbal, written and third party accusations of Inmate on Inmate/Staff on Inmate sexual assault or sexual harassment be documented and investigated. All reported sexual abuse and harassment investigations are then turned over to the PREA coordinator and PREA compliance manager for further review. Sexual abuse investigations are turned over to the Virginia State Police, as needed, for further investigation. From September 30<sup>th</sup>, 2016 to September 30<sup>th</sup>, 2017 there were a total of 4760 inmates admitted to jail with an average daily population of 387. Below you will find an accurate comparison of reported incidents happening between 2016 and 2017. It is our goal to attempt to find problem areas and put practices into place to further prevent future incidents from occurring.

### **Definitions:**

**Staff:** Facility employees, contractors, volunteers, and any other person providing services within the Central Virginia Regional Jail

**Inmate:** Any person confined at the Central Virginia Regional Jail

**Unsubstantiated Allegation** - An allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

**Substantiated Allegation** - An allegation that was investigated and determined to have occurred.

**Unfounded Allegation** - An allegation that was investigated and determined not to have occurred.

<b>Allegation of Inmate-on-Inmate Sexual Harassment</b>		
	<b>2017</b>	<b>2018</b>
<b>Substantiated</b>	2	1
<b>Unsubstantiated</b>	1	0
<b>Unfounded</b>	1	3
<b>Total</b>	4	4

<b>Allegation of Inmate-on-Inmate Abusive Sexual Contact</b>		
	<b>2017</b>	<b>2018</b>
<b>Substantiated</b>	0	0
<b>Unsubstantiated</b>	1	0
<b>Unfounded</b>	3	0
<b>Total</b>	4	0

<b>Allegation of Staff Sexual Misconduct</b>		
	<b>2017</b>	<b>2018</b>
<b>Substantiated</b>	0	0
<b>Unsubstantiated</b>	0	0
<b>Unfounded</b>	3	0
<b>Total</b>	3	0

<b>Allegation of Staff Sexual Harassment</b>		
	<b>2017</b>	<b>2018</b>
<b>Substantiated</b>	0	0
<b>Unsubstantiated</b>	0	0
<b>Unfounded</b>	2	1
<b>Total</b>	2	1

***SGM Consulting***

***Post Office Box 561  
King George, VA 22485  
Certified Auditor  
Prison Rape Elimination Act  
(PREA)***

To: Frank E. Dyer III  
Superintendent  
Central Virginia Regional Jail

From: Daniel P. Grimes dba SGM Consulting

Date: November 23, 2016

Subject: PREA Audit Report

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This auditor conducted a Prison Rape Elimination Act (PREA) Audit of your facility starting with the review of the electronic files provided by your PREA Manager. The onsite review began on October 25, 2016.

The audit was conducted to determine compliance with the United States Department of Justice Prison and Jail Standards for PREA.

The notice of the scheduled audit were posted throughout the facility six weeks prior the October 25, 2016. The notice offered inmates and staff the opportunity to express any concerns in reference to PREA incidents within your facility. This auditor received one letter from one inmate. The letter was co-signed by thirteen other inmates. All inmates who signed the letter are female. After careful review of the concerns expressed in the letter I determined that the concerns were not PREA related. I provided a copy of the letter to Captain J. Deane for any action she deemed necessary.

I selected the initial author of the letter for interview, however she declined. One other female inmate indicated that she was selected as spokesperson for group who signed the letter.

During my tour of your facility I did find an issue that would violate PREA Standard 115.15, limits to cross gender viewing. This was immediately corrected by your maintenance staff. The issue focused on toilet placement that allowed viewing of the opposite sex through cameras. Prior to my departure from your facility I inspected the areas again and determined that the issue was corrected. The areas inspected now comply with PREA Standard 115.15.

I bring to your attention that your PREA Manager and Coordinator were completely prepared for this audit and their records were filed and complete.

The following addresses my assessment of each standard pertaining to CVRJ.

1. Standard 115.11	Meets Standard
2. Standard 115.12	Meets Standard
3. Standard 115.13	Exceeds Standard (One Facility)
4. Standard 115.14	Meets Standard (No Youths)
5. Standard 115.15	Meets Standard
6. Standard 115.16	Meets Standard
7. Standard 115.17	Meets Standard
8. Standard 115.18	Exceeds Standard (Body Cameras)
9. Standard 115.21	Meets Standard
10. Standard 115.22	Meets Standard
11. Standard 115.31	Exceeds Standard
12. Standard 115.32	Meets Standard
13. Standard 115.33	Meets Standard
14. Standard 115.34	Exceeds Standard
15. Standard 115.35	Meets Standard
16. Standard 115.41	Meets Standard
17. Standard 115.42	Meets Standard
18. Standard 115.43	Meets Standard
19. Standard 115.51	Meets Standard
20. Standard 115.52	Meets Standard
21. Standard 115.53	Meets Standard
22. Standard 115.54	Meets Standard
23. Standard 115.61	Exceeds Standard
24. Standard 115.62	Meets Standard
25. Standard 115.63	Meets Standard
26. Standard 115.64	Meets Standard
27. Standard 115.65	Meets Standard
28. Standard 115.66	Meets Standard
29. Standard 115.67	Meets Standard
30. Standard 115.68	Meets Standard
31. Standard 115.71	Exceeds Standard
32. Standard 115.72	Meets Standard
33. Standard 115.73	Meets Standard
34. Standard 115.76	Meets Standard
35. Standard 115.77	Meets Standard
36. Standard 115.78	Meets Standard
37. Standard 115.81	Meets Standard
38. Standard 115.82	Exceeds Standard
39. Standard 115.83	Meets Standard
40. Standard 115.86	Meets Standard
41. Standard 115.87	Meets Standard

- 42. Standard 115.88
- 43. Standard 115.89
- 44. Standard 115.93

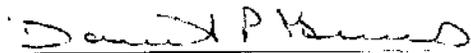
Meets Standard  
Exceeds Standard  
Meets Standard

My audit of your facility is complete. In compliance with Standard 115.403 I certify that I have no conflict of interest with respect to my ability to conduct this audit.

The Central Virginia Regional Jail is in compliance with all PREA Standards pertaining to jails.

I remain available for any future questions or concerns that you may have.

Respectfully submitted

  
Daniel P. Grimes

Daniel P. Grimes