

PREA Facility Audit Report: Final

Name of Facility: State Farm Correctional Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/13/2026

Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



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



Auditor Full Name as Signed: Jack Fitzgerald

Date of Signature: 06/13/2026

AUDITOR INFORMATION

Auditor name: Fitzgerald, Jack

Email: jffitzgerald@snet.net

Start Date of On-Site Audit: 04/21/2026

End Date of On-Site Audit: 04/23/2026

FACILITY INFORMATION

Facility name: State Farm Correctional Center

Facility physical address: 3500 Woods Way , State Farm , Virginia - 23160

Facility mailing address:

Primary Contact

Name:	Joseph Allotey
Email Address:	joseph.allotey@vadoc.virginia.gov
Telephone Number:	(804) 219-6845

Warden/Jail Administrator/Sheriff/Director	
Name:	Garry Jones
Email Address:	Garry.Jones@vadoc.virginia.gov
Telephone Number:	(804) 372-4051

Facility PREA Compliance Manager	
Name:	Teresa Rowley
Email Address:	teresa.rowley@vadoc.virginia.gov
Telephone Number:	(804) 372-4489
Name:	Christina Henderson
Email Address:	christina.henderson@vadoc.virginia.gov
Telephone Number:	

Facility Health Service Administrator On-site	
Name:	Tammy Brisbane
Email Address:	Tammy.Brisbane@vadoc.virginia.gov
Telephone Number:	(804) 372-4690

Facility Characteristics	
Designed facility capacity:	737
Current population of facility:	646
Average daily population for the past 12 months:	646

Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys
Age range of population:	18-82
Facility security levels/inmate custody levels:	W. 1-2
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	242
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	80
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	81

AGENCY INFORMATION

Name of agency:	Virginia Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	6900 Atmore Drive, Richmond, Virginia - 23225
Mailing Address:	P.O. Box 26963, Richmond, Virginia - 23261
Telephone number:	8046743000

Agency Chief Executive Officer Information:

Name:	Joseph Walters
Email Address:	Joseph.Walters@vadoc.virginia.gov
Telephone Number:	804-887-8080

Agency-Wide PREA Coordinator Information

Name:	Tammy Barbetto	Email Address:	tammy.barbetto@vadoc.virginia.gov
--------------	----------------	-----------------------	-----------------------------------

Facility AUDIT FINDINGS**Summary of Audit Findings**

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

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

Number of standards exceeded:

1

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Number of standards met:

44

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-04-21
2. End date of the onsite portion of the audit:	2026-04-23

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	☒ Yes ☐ No
---	--

a. Identify the community-based organization(s) or victim advocates with whom you communicated:	The Auditor had phone interviews with local and regional Rape Crisis Agencies, spoke with an LGBTI support agency and with representatives of local and regional hospitals. The Auditor also completed internet searches about the facility and reviewed various state websites for information on SAFE/SANE services, payments for forensic exams and the training for Rape Crisis advocates. The Auditor also researched the interpretive services used by the facility. The Auditor made calls to outside reporting options to confirm the numbers listed in the facility and the ability for them to receive a call. The Auditor also completed web searches for information on the facility, including news stories. Research was also completed on the SANE Certification process, the State protocol for the treatment of sexual abuse victims, including the law enforcement interaction, and ensuring that services are available without cost. The Auditor reviewed the state website for publicly available information on the Prison Rape Elimination Act and how third-party individuals can report a concern.
AUDITED FACILITY INFORMATION	
14. Designated facility capacity:	737
15. Average daily population for the past 12 months:	646
16. Number of inmate/resident/detainee housing units:	6
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	☐ Yes ☒ No ☐ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	665
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	3
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	3
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	2
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	2
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	10
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	2

31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	242
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	81

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	80
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☒ Age ☒ Race ☒ Ethnicity (e.g., Hispanic, Non-Hispanic) ☒ Length of time in the facility ☒ Housing assignment ☐ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	After identification of the target population, the auditor used the housing assignment sheets and random numbers to select the remaining population to include individuals in each housing unit.

43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	☒ Yes ☐ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	15
As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	4

49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	2
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	2
51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The Auditor requested in advance a list of all individuals in the facility for each of the target groups. The facility PREA Compliance Manager, the PREA Analyst from the DOC PREA Office and the Auditor reviewed the list on the first day of the audit. There was no individual who identify in this category.
54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The Auditor requested in advance a list of all individuals in the facility for each of the target groups. The facility PREA Compliance Manager, the PREA Analyst from the DOC PREA Office and the Auditor reviewed the list on the first day of the audit. There were three cases on potential sexual abuse in the past year. none of the inmates in those cases were still in the facility.
55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The Auditor requested in advance a list of all individuals in the facility for each of the target groups. The facility PREA Compliance Manager, the PREA Analyst from the DOC PREA Office and the Auditor reviewed the list. The Auditor discussed with medical and mental health that any resident who disclosed sexual abuse as part of the screening would be referred to mental health for follow-up. No residents disclosed past abuse during the inmate interviews.
56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The Auditor requested in advance a list of all individuals in the facility for each of the target groups. The facility PREA Compliance Manager, the PREA Analyst from the DOC PREA Office and the Auditor reviewed the list. The Auditor also confirmed with management during the tour and officers working the Special Management Unit to confirm victims of sexual assault or those at risk of sexual abuse are not housed in this unit. The Deputy Warden confirmed there are other options they would employ to keep an inmate at risk of sexual abuse or retaliation instead of placement in special management.
57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	14
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☒ Length of tenure in the facility ☒ Shift assignment ☒ Work assignment ☒ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	☒ Yes ☐ No

61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	The Auditor interviewed individuals from all shifts and in different roles in the environment, including custody and noncustodial positions.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	14
63. Were you able to interview the Agency Head?	☒ Yes ☐ No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	☒ Yes ☐ No
65. Were you able to interview the PREA Coordinator?	☒ Yes ☐ No
66. Were you able to interview the PREA Compliance Manager?	☒ Yes ☐ No ☐ NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☒ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of CONTRACTORS who were interviewed:	3
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☒ Education/programming ☒ Medical/dental ☐ Food service ☐ Maintenance/construction ☐ Other

70. Provide any additional comments regarding selecting or interviewing specialized staff.	The Auditor was able to interact informally with staff and inmates during the tour and at other points outside the formal interview room. The Auditor was able to test the function of critical reporting methods in the housing units, confirm the accuracy of posted materials, and verify the privacy of mail between inmates and professional agencies
SITE REVIEW AND DOCUMENTATION SAMPLING	
Site Review	
PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.	
71. Did you have access to all areas of the facility?	☒ Yes ☐ No
Was the site review an active, inquiring process that included the following:	
72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	☒ Yes ☐ No
73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	☒ Yes ☐ No

74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	☒ Yes ☐ No
75. Informal conversations with staff during the site review (encouraged, not required)?	☒ Yes ☐ No
76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	The Auditor was able to interact informally with staff and inmates during the tour and at other points outside the formal interview room. The Auditor was able to test the function of critical reporting methods in the housing units, confirm the accuracy of posted materials, and verify the privacy of mail between inmates and professional agencies. Observations throughout the tour and subsequent movement about the facility allowed the auditor to ensure consistent applications of the reported practices. The Auditor also reviewed the unit logbooks to see if supervisory rounds and cross gender announcement are made and documented regularly. The Auditor also reviewed the logs against video surveillance to ensure the tour were in fact happening.
Documentation Sampling	
Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.	
77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	☒ Yes ☐ No

78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	The Auditor selected a sample of current inmate files to review for screening and education on the Prison Rape Elimination Act. The Auditor reviewed the timeliness of initial and 30-day reviews. The Auditor also looked for referral to mental health if the individual had a past abuse history. The Auditor also selected a series of staff, including those hired in the last year, promoted, and those employed with the Virginia DOC for more than five years. The Auditor also looked for prior institutional employment checks that had been completed. The Auditor reviewed a sample of volunteers and contractors to ensure screening and education were provided to them.
SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY	
Sexual Abuse and Sexual Harassment Allegations and Investigations Overview	
Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.	

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	3	0	2	1
Total	3	0	2	1

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	3	0	3	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	5	0	5	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

3

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☐ No ☒ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☐ No ☒ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	5
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	☐ Yes ☐ No ☒ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:

2

99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?

☐ Yes

☐ No

☒ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?

☒ Yes

☐ No

☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.

The Auditor reviewed all 8 cases from the past year. There were two cases investigated that were determined to not meet the federal definitions for sexual assault or sexual harassment. One case was a staff- inmate allegation and one was an inmate-inmate allegation. The Virginia Department of Corrections investigated one potential criminal case of staff inmate contact. The prosecutor did not accept the case for criminal prosecution, but the facility substantiated the administrative investigation of undue familiarity.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

☐ Yes

☒ No

Non-certified Support Staff

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

☐ Yes

☒ No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

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

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.3 Prison Rape Elimination Act (PREA) OP 135.2 Rules of Conduct Governing Employees' Relationships with Offenders PREA Coordinator and PREA Analyst job descriptions Agency-wide organization chart DOC Intranet – PREA Information Page DOC PREA Compliance Managers list State Farm Correctional Center Facility Management Chart

Job descriptions

DOC List of PREA Compliance Managers

Memo on PREA Compliance Managers

Zero Tolerance posters/ notifications

Individuals interviewed/ observations.

Interview with PREA Coordinator

Interview with PREA Compliance Manager

Interviews with the PREA Analyst

Interview with the Director of DOC

Interview with Assistant Warden

Interview with Staff

Interview with Inmates

Tour Observations

Summary determination.

Indicator (a). The Virginia Department of Corrections has developed an agency-wide Policy on efforts to ensure compliance with the Prison Rape Elimination Act. The policy OP 038.3 Prison Rape Elimination Act (PREA) was written to address the various requirements of the standards. The 21-page policy sets forth a zero-tolerance expectation for any sexual abuse or harassment at the agency's facilities. The policy states, "The DOC has a Zero Tolerance Policy that strictly prohibits staff, contractor, volunteer, and intern fraternization and sexual misconduct with inmates and probationers/parolees, or between inmates and CCAP probationers/parolees. The DOC actively works to prevent, detect, report, and respond to any violation." The policy goes on to describe prohibited behaviors. The policy outlines the requirements for agency and facility administrators to ensure PREA compliance. Policy language encompasses various aspects of the Virginia DOC's prevention efforts. Pages 12-13 of OP 038.3 cover the detection efforts, while pages 14-15 cover responding to issues of sexual harassment or sexual abuse. Policy OP 135.2 Rules of Conduct Governing Employees' Relationships with Inmates further states the Virginia DOC's zero-tolerance position toward sexual misconduct.

The facility staff at State Farm Correctional Center showed knowledge consistent

with training materials about their role in preventing, detecting, and responding to sexual assault claims. Also, posters throughout the facility remind inmates and staff of the zero-tolerance expectation. Random inmates reported an environment free from sexual abuse.

Indicator (b). State Farm Correctional Center is one of 41 Adult Correctional facilities run by the Virginia Department of Corrections. PREA policy OP 038.3 Prison Rape Elimination Act (PREA) defines the role of the PREA Coordinator (pages 3) and states the PREA/ADA Supervisor will serve in this capacity. The policy defines the PREA Coordinator's "authority to develop, implement, and oversee DOC efforts to comply with the Prison Rape Elimination Act (PREA) National Standards in all DOC facilities." Supporting documents show the PREA Coordinator's assignment to the role within the agency's administrative chart. The PREA Coordinator is supported by a staff of 3 PREA Analysts who cover three regions and field statewide calls from the PREA hotline. Interviews with the PREA Coordinator (PREA/ADA Supervisor) confirm that she has sufficient time and access to key correctional administrators, including the Director of the Department of Corrections, to influence policy and resources that ensure PREA-safe environments within the Virginia DOC system. The PREA Analyst, working under the PREA Coordinator, ensures that facilities maintain compliance through regular monitoring visits and provides technical assistance and training as needed. The PREA Coordinator's immediate Supervisor is the agency's former PREA Coordinator, who works for the Chief of Correctional Operations.

The PREA Coordinator has a team of PREA Analysts who work with facilities on ongoing compliance. She also has ADA analysts who can assist in identifying individuals who may require support to ensure PREA comprehension due to medical or cognitive issues. The PREA Analyst was present throughout the Audit and provided additional information when needed. The facility provided the agency flow chart and the job descriptions of the PREA Coordinator and the PREA Analyst. The Virginia DOC Director confirmed the PREA Coordinator has access to the agency's senior leadership and the ability to influence policy to ensure further compliance.

Indicator (c) The OP 038.3 Prison Rape Elimination Act (PREA) defines the role of the PREA Compliance Manager (page 3). The policy requires the Warden to assign an individual to coordinate the facility's efforts to comply with PREA. The Policy states the responsibility within the facility to coordinate the facility's efforts to prevent, detect, and respond to allegations of sexual misconduct. The Auditor was provided a facility flow chart showing the relationship between the PREA Compliance Manager role and the State Farm Correctional Center's leadership. Supporting documentation also includes a memo from the state's original PREA Coordinator defining the roles and expectations of a PREA Compliance Manager. Interviews with the PREA Coordinator, PREA Analyst, and Assistant Warden confirm that the PREA Compliance Manager has sufficient access to key correctional administrators, including the

Warden, to influence policy and resources, ensuring a safe PREA environment at State Farm Correctional Center. As the Institution's Operations Manager, they have daily duties that allow them to monitor and review how the facility manages PREA concerns, including ensuring that individuals with PREA conflicting scores are kept apart within the institution. A memo was provided from the Warden when naming the IOM as the PREA Compliance Manager for the Institution. The PCM works directly for the Warden according to the facility flow chart provided. The Assistant Warden, who was interviewed due the Warden being out on leave, confirmed that any compliance issues identified by the PCM would be dealt with swiftly. The PCM works closely with the Warden, Assistant Warden, Major and the Chief of Housing and Programming. The PCM also works with the Regional PREA Analyst to ensure ongoing compliance.

Compliance Determination:

The Virginia Department of Corrections has policies that define the steps taken to prevent, detect, and respond to incidents of sexual abuse and sexual harassment. The policies OP 038.3, Prison Rape Elimination Act (PREA), and OP 135.2, Rules of Conduct Governing Employees' Relationships with Inmates, define the Zero Tolerance expectation. The policies outline the roles of the state PREA Coordinator and the facility PREA Compliance Manager, as well as prohibited behaviors for all staff, volunteers, contractors, and inmates. Interviews with the Agency PREA Coordinator and State Farm Correctional Center PREA Compliance Manager confirm their roles in maintaining PREA compliance. Both individuals believe they have the capacity in their jobs to advocate for policy or procedural changes needed to support inmate safety. This was confirmed with the Assistant Warden and the representative of the Director of the Virginia Department of Corrections.

Interviews with the DOC Director and the Assistant Warden support compliance with all standard expectations. Policies reviewed by the Auditor in completing the audit process not only described in depth the agency's expectation to protect, detect, and respond to sexual misconduct but also clearly defined the roles of the state PREA Coordinator and the facility's PREA Compliance Manager. The Policy also addresses prohibited behaviors and sanctions for any form of sexual misconduct. Inmates, in formal interviews and spoken with during the tour, confirmed that sexual misconduct is addressed, and they had knowledge of resources available if a concern arises. The facility has been able to maintain a safe environment where inmates who support violent sexual assault is not a concern. Random staff interviews further support a zero-tolerance culture. Individual staff interviewed supported a well-trained complement who is aware of their duties in promoting a sexually safe environment. The last element in supporting compliance is the observed relationship between the central office PREA staff and the facility leadership. It was clear that the individuals had regular contact and discussions on PREA and individual inmates. Compliance is based on the above factors, policies, and various interviews supporting a zero-tolerance culture. The Auditor also considered the facility staff and Inmate interviews

	supporting sufficient training and resources to respond to an incident of sexual misconduct. The Auditor finds the standard has been exceeded based on two strong relationships. 1) The Auditor believes the relationship between the facility administration and the PREA Coordinator and her staff are supportive of developing and maintaining a PREA-safe environment. The auditor observed familiarity and discussions on how the PREA Office could support the facility. 2) Similarly, the Auditor found the inmates stated trust the facility leadership listens to concerns and trust investigations will occur when sexual misconduct is reported. The Auditor views these relationships as a critical building block of maintaining a safe environment that supports reporting and investigation of sexual misconduct. The Auditor also considered the agency's policies in determining the exceeds standard designation. The Virginia DOC has intermingled and cross-referenced PREA requirements into multiple policies to ensure, depending on what policy a staff uses as a reference, they are afforded the same information supporting preventing, detecting, and responding to incidents of sexual misconduct.
--	---

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.3 Prison Rape Elimination Act (PREA) OP 260.1 Procurement of Goods VA DOC Website Announcement of the return of Lawrenceville to VADOC Director Memo Individuals interviewed/ observations. Interview with PREA Coordinator (PC) Interview with PREA Analyst Summary Determination

	Indicator a) The element is not applicable as the DOC is not currently contracting with any agency for the housing of inmates. The Virginia Department of Corrections addresses the requirements of this indicator in two policies. The agency's PREA policy OP 038.3- PREA states, "contract for the confinement of DOC Inmates must include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards." Policy OP 260.1- Procurement of Goods states, "All contracts for the confinement of DOC Inmates must include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards.". It defines the guidelines for emergency contracting of a facility that is not compliant with PREA. "Only in emergency circumstances in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed will the DOC enter into a contract with any entity that fails to comply with these standards. In such a case, all unsuccessful attempts to find an entity in compliance with standards must be documented." The Auditor was provided with documents, memo and new release confirming the agency took control of the Lawrenceville facility in 2024 from the GEO group, The Auditor has previous knowledge of the contract language with that agency requiring PREA Compliance. Indicator b) The element is not applicable as the DOC is not currently contracting with any agency for the housing of inmates. The Auditor found language in the two policies mentioned in indicator a). The policies state, "Any new contract or contract renewal must provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards." The PREA Coordinator confirms that their staff would also be required to monitor compliance and receive complaints from any contracted organization. Compliance Determination: Though the elements are not currently applicable the documentation support that the Virginia Department of Corrections has experience in ensuring contractors comply with the PREA standards. The agency has policy language in place requiring the contracting of inmates to any outside agency includes PREA Compliance. The Auditor determined the Virginia Department of Corrections was meeting the requirements of this standard based on the documents reviewed in the OAS and Virginia DOC websites. As noted, the elements have been marked as not applicable as the last contracted facility returned to control of the Virginia Department of Corrections in August of 2024.
--	---

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard

	Auditor Discussion Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 401.1 The Development and Maintenance of Post Orders OP 401.2 Security Staffing OP 401.3 Administrative Duty Coverage Staff Duty Rosters State Farm Correctional Center Staffing Plan 2026 and 2025 Annual Review information from PREA office staff State Farm CC Informational Guide Logs and Video stills of Supervisor Tours Individuals interviewed/ observations. Interview with PREA Coordinator Interview with PREA Compliance Manager Interview with Deputy Warden. Interview with Staff Interviews with Inmates Observations on tour of inmate monitoring across the facility Summary Determination Indicator a). Virginia Department of Corrections Policy 401.2 Security Staffing (page 8) covers the language of this indicator. The policy uses the standard language to describe the development requirements and ongoing reviews of staffing needs at Virginia’s Department of Corrections facilities. The policy language encompasses the 11 elements listed in Indicator A). The Policy is confidential for security purposes and will not be directly quoted here. The State Farm Correctional Center has provided a copy of the facility's current staffing plan for 2024. The facility has provided documents supporting the elements of this standard, including the narrative, schematics, and camera locations. The facility is well-covered with rapid-eye cameras and PTZ zoom cameras. The facility is reportedly not subject to any legal judgment and has not been inspected by any state or federal oversight body. The Auditor made
--	--

some suggestions on improving the documentation to add more information on support positions, such as correctional case managers, mental health professionals, and unit managers who routinely move through the units and provide additional support to custody staff. The document outlines the current vacancies in the facility and the efforts to realign assignments to ensure that minimum coverage is met. The document provided to the auditor, along with observations from the tour, highlighted how monitoring technology supports inmate supervision. During the tour, the management staff were aware of potential blind spots and described procedures in place to mitigate risk. The staffing plan is based on 717 inmate beds; however, the facility operates at a 12-month average of 648 inmates. On day one of the audit, the population was 665.

The State Farm Correctional Center was reportedly the first dormitory designed facility. The facility has a supportive living unit for inmates with medical needs who need assistance. This unit has direct nursing 24 hours per day and other inmates work in assisting residents with tasks. There are 5 dormitory units with bunk divided between two side A and B. The facility also has a 12-bed restorative housing unit. Multiple staff members supervise the housing pods from direct supervision posts and sub control post in each building. Officers can easily see across the unit, and the control post allows for additional sets of eyes and the ability to call for assistance when an officer is dealing with a concern. Master Control also can monitor areas in the facility. Staff offices for counselors, and unit managers are located just off the units, providing additional eyes and ears to monitor interactions between inmates and staff.

State Farm and the Virginia DOC actively recruit staff to fill vacancies. When callouts occur, decisions are made on post assignments, which may result in reduced programming activities. The Warden, in the interview and in the annual staffing report, has set a target number of employees needed when the newly renovated medical complex opens. The facility's current staffing total is reportedly approved for 361 positions, with 46 vacancies. Agency policy requirements for staff plans is consistent with the standard language. "The facility staffing plan provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates and CCAP probationers/parolees from sexual abuse.

3. In calculating adequate staffing levels and determining the need for video monitoring, the Facility Unit

Head will take into consideration: (§115.13[a]; §115.213[a])

- a. Generally accepted detention and correctional practices
- b. Any judicial findings of inadequacy
- c. Any findings of inadequacy from Federal investigative agencies
- d. Any findings of inadequacy from internal or external oversight bodies
- e. All components of the facility's physical plant, including "blind spots" or areas

where staff, inmates, or CCAP probationers/parolees may be isolated (§115.213[a])

f. The composition of the inmate or CCAP probationer/parolee population (§115.213[a])

g. The number and placement of supervisory staff

h. Facility programs occurring on a particular shift.

i. Any applicable State or local laws, regulations, or standards

j. The prevalence of substantiated and unsubstantiated incidents of sexual abuse (§115.213[a])

k. Any other relevant factors (§115.213[a]) “

A review of the document provided included information on the above indicators as well as various programming which impacts staffing. The document also discusses how electronic surveillance supports safety in the mission. The auditor was able to see the increase in overall staffing from the previous years report. As the state farm correctional center sits on a working dairy farm and a level 2 facility some inmates are eligible to work at the DOC milk plant and others also can go outside the secure perimeter to cut grass. The report also addressed staffing for areas outside of this audit which also fall under the Warden’s responsibility including the DOC secure medical unit at local hospital in Richmond.

Indicator b). An interview with the Warden confirms that the State Farm Correctional Center has not fallen below its approved minimum staffing level in the past year. The facility can ‘draft’ overtime work from either voluntary or mandated staff. There is a daily log for each shift that documents when staff call out and who is replacing the post assignment. The Warden receives a daily report on the amount of overtime drafted, and the Warden or Major would be notified of any emergency where minimums would not be met. The Warden also confirms the ability to order in staff if needed. Supervisory staff also confirmed the ability to draft trained non-security staff if needed to man critical posts to maintain facility safety. Residents' support line staff are available, and Supervisory staff also come through the units during the shift. Residents in this environment report they feel safe from sexual misconduct. The facility tracks all adjustments to the schedule, no matter the reason. The most common reasons for schedule adjustments were routine time off, staff callouts and training.

Indicator c). The 2026 annual review of the staffing plan was completed by the PREA Coordinator for the Virginia Department of Corrections. The report included information on staffing needs, adjustments made to the staffing plan and identified areas for monitoring technology to improve institutional safety. The facility has upgraded or added to the 224 several cameras and has begun to issue body cameras

to staff in responding roles. The Warden and senior staff developed the report at the facility level, with input from the regional PREA office analyst. The Warden met with, the Major, CHAP, Captains, investigators and, the PREA Compliance Manager. The report noted there were 46 vacancies at the time of the review in January 2026. The report described the allocation of cameras in the facility. The PREA Analyst, who was onsite, confirmed the information presented in the documentation. The facility has a limited number of Sexual Abuse allegations as reflected in the files provided and the Auditor's review of the agency's annual report. Various leadership and critical roles can also access the camera system including the Warden, Deputy Warden, Major, and the facility investigator.

Indicator d). Virginia DOC policy OP 401.1 Development and Maintenance of Post Orders addresses the concerns of this indicator. The Policy states, "Post Orders will require that Lieutenants and above conduct and document unannounced rounds identify and deter staff sexual abuse and sexual harassment." "Unannounced rounds must be conducted intermittently during the month and must be conducted on both night and day shifts." The policy also goes on to state, "Staff assigned to any post are prohibited from alerting other employees that a supervisor is conducting rounds to identify and deter sexual abuse and sexual harassment." Policy OP 401.3 requires the documentation of the rounds. "Conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Unannounced rounds should be made intermittently during the month and can be scheduled as part of the 24-hour clock." The Virginia Department of Corrections has creative PREA Logbooks in which staff record opposite-gender announcements and unannounced supervisory rounds. The logbooks are located in every housing unit. The Auditor was provided with copies of documentation of unannounced rounds from various locations within the institution, including housing units and other areas of the facility, in advance. The facility had provided documentation in the OAS in advance of these tours over the last year. The auditor selected random dates during the audit to review supervisory rounds and video evidence, consistent with the logbooks. The information was uploaded to the OAS as requested. The Auditor also confirmed the unannounced rounds through visual observation of logs in housing units in the prison during the tour. The Auditor interviewed housing officers, control officers, and supervisory staff to confirm that tours are unannounced. The Auditor was able to speak with Sergeants and Lieutenants about how they routinely move around the buildings. Inmates also confirmed they have access to supervisors if they have a concern. The Auditor saw inmates interacting with the management team during the tour. These observations and inmate interviews support the idea that senior leadership is visible and available to residents.

Compliance Determination:

The Auditor determined that the State Farm Correctional Center meets the requirements of this standard. The Auditor concluded the facility has an adequate staffing plan to protect inmates from sexual abuse. The Auditor reviewed VA DOC

	policies that applied, the facility Staffing Plan, Unannounced Rounds, Duty Rosters, and the annual staffing plan review. The Auditor confirmed practice through observations on the tour and interviews conducted with staff and inmates. The Auditor's interviews with the Warden, PREA Compliance Manager, PREA Analyst, and PREA Coordinator confirmed a process is in place to communicate when an identified need is recognized. The staffing plan assessment identified needs. Compliance is based on the management's understanding of the standard's expectations, the resident's confirmation of staff access, and the auditor's review of policies, logbooks, and electronic documentation provided and reviewed.
--	---

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 425.4 Management of Cell and Bed Assignment Memo from Warden Population report with ages Individuals interviewed/ observations. Interview with PREA Compliance Manager Interview with Random staff Observation of Population on Tour Summary Determination Indicator a) No Youthful inmates are housed at State Farm Correctional Center. Indicator b) No Youthful Inmates are housed at State Farm Correctional Center. Indicator c) No Youthful Inmates are housed at State Farm Correctional Center.

	Compliance Determination: The Virginia Department of Corrections does not house juveniles at the state farm complex. The agency has a policy OP 425.4 Management of Cell and Bed Assignments that addresses the requirements of this standard. Though Youthful Inmates do not exist at State Farm Correctional Center, the agency has policy language defining the requirements of sight and sound separation in the housing of Youthful Inmates from adult prisoners. The classified policy also requires any time outside housing where adult and youthful inmates may be in sight or sound of each other, and the youthful inmate is required to be under the direct supervision of staff. The policy also states the restorative housing can not be used except in exigent circumstances for youthful inmates. Without a Youthful Inmate, the Auditor could only rely on policy language to determine compliance. The Auditor reviewed the population report, spoke with staff and made observations on the tour to ensure no youthful inmates were in the current population.
--	--

115.15 Limits to cross-gender viewing and searches	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 350.2 Training and Development OP 401.1 Development and Maintenance of Post Orders OP 401.2 Security Staffing OP 445.4 Screening and Searches of Persons OP 801.1 Facility Physical Plant and Sanitation Logbooks of cross-gender announcements PREA and Search Training Materials Training Records for new and in-services on Search. Individuals interviewed/ observations. Interview with Deputy Warden

Interview with Random Staff

Interview with Random Inmates

Summary Determination

Indicator a). The Virginia Department of Corrections has policy in place to address inmate rights to cross-gender observation during strip searches or other OP Policy 445.4, the agency's search policy, sets forth the requirements for strip searches. "One Corrections Officer and one other DOC employee, both of whom are of the same gender as the inmate or CCAP probationer/parolee or of the gender indicated on the approved Strip Search Deviation Request, will accompany the inmate or CCAP probationer/parolee into an appropriate area where privacy can be ensured. No person of the opposite gender can be present or witness the strip search." The agency policy requires if there is a belief that an inmate is concealing contraband the Regional Director be notified and that a medical professional completes any probing of a body cavity. "For Institutions, the Facility Unit Head or ADO may authorize the body cavity search of an inmate any time there is a reasonable belief that the inmate might be concealing contraband within a body cavity. The Regional Administrator must approve any use of force in conducting a body cavity search of an inmate. The inmate must first be given a strip search in accordance with this operating procedure. A medical practitioner only will conduct the body cavity search and inspection in private." The policy requires a security person of the same gender to be present as the inmate. The policy goes on to state that if the Inmate is transgender or Intersex, the gender of the security staff person will be consistent with the individual-approved Strip Search Deviation Request. The Deputy Warden reports there were no incidents of cross-gender body cavity or strip searches. The Deputy Warden and PREA Compliance Manager report that all body cavity searches would be documented, including the individual present and the justification for such actions. Policy OP 445.4 also requires an incident report to document any exigent circumstance consistent with the Warden's stated expectations. There were no reported cross-gender strip searches or body cavity searches in the past year at State Farm Correctional Center.

Indicator b). The State Farm Correctional Center does not house female inmates. The VA DOC permits female security staff to conduct cross-gender pat-down searches of male inmates in emergency situations. Policy OP 445.4 ensures that female inmates in the DOC system are not prohibited from participating in programming because of a lack of same-gender staff in its female facilities. "Access to regularly available programming or other out-of-cell opportunities for female inmates and CCAP probationers/parolees must not be restricted in order to comply with the search requirements."

Indicator c). As noted in indicator b) the State Farm is an all-male inmate population.

Virginia DOC policy covers the language of this indicator. The policy states in sections on frisk search, strip search, and body cavity searches that all cross-gender searches will be documented. "Female Corrections Officers will frisk search transgender and intersex inmates and probationers/parolees unless exigent circumstances or an approved Strip Search Deviation Request 810_F2 are present and documented; exceptions to this requirement should be referred to the facility Treatment Team. 3. DOC employees will not search or physically examine a transgender or intersex inmate or CCAP probationer/parolee for the sole purpose of determining the individual's genital status. If the genital status is unknown, it may be determined through a conversation with the inmate or CCAP probationer/parolee, a review of the medical record, or if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner." Any cross-gender strip search is required to be documented in an incident report consistent with OP 038.1 Reporting Serious or Unusual Incidents. There was no reported cross-gender searches at State Farm Correctional Center, so no documents were available for review. Inmates and staff persons confirm that cross-gender searches do not occur.

Indicator d). Virginia Department of Corrections policy OP 801.1 (page 3) states, "Facility procedures and practices shall enable Inmates to shower, perform bodily functions, and change clothing without a 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." Policy OP 401.2 describes, as part of housing unit supervision, the same description stated above, as well as a requirement for opposite-gender staff announcements. "Staff of the opposite gender must announce their presence when entering an Inmate housing unit and must document these announcements in the logbook." The auditor confirmed through random interviews with staff and inmates the practice of making cross-gender announcements. Inmates report that they generally hear these announcements or see who works in the unit from their bunks. Toilets and Showers are on one end of each unit. Inmates confirm that female staff do not routinely enter the shower or toilet area and believe they would only do so with a warning. Each shower area has gang showers with a common drying area. During the tour, the Auditor saw a variety of staff announcements, including those made by the officer on the floor and by female staff members entering the space. The Auditor reviewed documentation in the OAS of PREA Logs supporting the staff announcements made on housing units. The Auditor also checked the unit logs on the tour to see where the documentation was completed. The Auditor made observations on the tour for line of site from both the staff working to floor and the staff working in the unit control office to ensure no violation of expected privacy. The Auditor also reviewed the ability of the camera system to further ensure cross gender viewing was not occurring. Residents are supposed to get changed in the shower area and are not supposed to be on the housing floor without a shirt on. The State Farm logs were provided from across the facility over the past year to support the institutional practice of cross-gender announcements. Resident interviews did not raise any concerns in this area.

	Indicator e) This indicator is currently suspended from consideration in the Auditor's determination of compliance. Indicator f). This indicator is currently suspended from consideration in the Auditor's determination of compliance. Compliance Determination: The Auditor confirmed through the interview process that staff had been appropriately trained to conduct cross-gender searches, respectful searches of individuals, and make opposite-gender announcements when entering Inmate living units. Inmate interviews confirmed the ability to shower, change clothing, and use the restroom without the non-medical staff of the opposite gender observing them. Documentation provided support staff are trained and prepared to complete frisk searches of opposite gender individuals in an exigent circumstance. The auditor reviewed the agency's policies, procedures, and training documents, made observations during the tour, and interviewed staff and inmates to determine compliance with this standard. Compliance is based on policy, observations made during the audit, documentation provided, and interviews with staff and residents supporting cross-gender searches and viewing, which do not occur.
--	--

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – 038.3 Prison Rape Elimination Act (PREA) PREA Brochure in English and Spanish Acknowledgement forms in multiple languages Past Interpretive Service Contracts (Propio and Purple) Contract with Homeland Languages Services Comprehensive Education Video Memo from Warden on Interpretive services

ADA Trained staff certifications

Tablet with the capacity to enlarge print or observe Spanish documents.

Documentation of use of interpretive services in completion of screening/ education of inmates.

Individuals interviewed/ observations made.

Inmate education acknowledgment

Interviews with Staff

Interviews with Offenders

Observations of PREA Information posted

Summary Determination

Indicator a). State Farm Correctional Center has services in place to ensure disabled and Limited English Proficient Inmates have the appropriate understanding and access to services described in this standard. Policy OP 038.3, the PREA policy, defines "disabled" and "limited English proficiency" in the same language as the standard. The policy ensures equal access to the facility's efforts to protect, detect, and respond to incidents of sexual abuse and sexual harassment. The policy acknowledges the protections afforded under the Americans with Disabilities Act. The Policy states, "1. Staff must take appropriate steps to ensure that inmates and CCAP probationers/parolees with a disability have an equal opportunity to participate in or benefit from all aspects of the DOC's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

a. Inmate and CCAP probationer/parolee disabilities include but are not limited to deaf or hard of hearing, blind or have low vision, and inmates and CCAP probationers/parolees with intellectual, psychiatric, or speech disabilities or limited reading skills.

b. Staff will arrange for inmates and CCAP probationers/parolees to receive training and materials using auxiliary aids and services so that the inmate or CCAP probationer/parolee understands the information; see Operating Procedure 801.3, Managing Offenders with Disabilities. (§115.33[d],

c. Staff will provide inmates and CCAP probationers/parolees with access to interpreters who can effectively, accurately, and impartially interpret, both receptively and expressively, using any specialized vocabulary, when necessary, to ensure effective communication with inmates and CCAP probationers/parolees who are deaf or hard of hearing.

d. Staff should utilize Video Remote Interpreting (VRI) to communicate effectively with deaf inmates and CCAP probationers/parolees when American Sign Language interpreters are not available on site.

e. Staff will provide written materials in formats or through methods that ensure effective communication with inmates and CCAP probationers/parolees with disabilities, including those who have intellectual disabilities, limited reading skills, and who are blind or have low vision.

f. Staff are not required to take any action that they can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens, as those terms are used in regulations promulgated under Title II of the Americans With Disabilities Act, 28 CFR 35.164, Nondiscrimination on the Basis of Disability in State and Local Government Services, Duties.”

Documents support the idea that key facility staff members have undergone additional training in working with individuals with disabilities and those who are deaf or hard of hearing. All employees are informed of the at-risk populations described in this standard. The Director of the Department of Corrections spoke on the expectations of providing full access and protection to these at-risk populations. The PREA Coordinator also oversees the agency's efforts to ensure compliance with ADA regulations. Interviews with targeted inmates and staff show that there are services in place to ensure inmates understand PREA and how to report a concern. In reports provided by the facility on ADA accommodations, the Auditor was able to see aids to impairment that have been provided. Inmates are provided with hearing and visual aids, as well as special needs plans, that aid in their ability to participate in all aspects of facility life. In addition to state ADA specialists, the SFCC facility has staff trained in identifying and working with ADA individuals and a secondary training for working with Deaf and hearing impaired individuals. Interviews with intake staff confirmed that individuals with cognitive challenges would be provided the information in a one-to-one setting to allow the information to be broken down into small pieces that could be retained. Most inmates at State Farm are transitioned from other facilities so the Intake staff can access prior records to understand the individuals needs.

The facility and agency have ensured information is available in the most common languages: English and Spanish. The agency has the capacity to translate other materials into various languages as needed and can provide professional interpretive services through contracts. Intake staff confirmed that they also assess reading ability to ensure those who cannot read truly understand the information provided. Inmates have received PREA education at other DOC facilities before coming to State Farm Correctional Center. The Auditor interviewed individuals who were hearing impaired, and visually impaired individuals. The State Farm Correctional Center also has a supportive living unit with inmates with disabilities or health concerns, and there were also Limited English Proficient inmates. The Department has a individual come on site

to work with those who use ASL weekly to support communication with healthcare staff and others as needed. The various individuals in each group understood the Zero Tolerance policy toward sexual abuse or harassment and how to report a concern. Using a common case management system in VACORIS, the facility can identify concerns in the inmate record that might be a barrier to understanding and addressing those concerns.

Indicator b). OP 038.3 states, “Facility staff must take reasonable steps to ensure Inmates who are limited English proficient are afforded meaningful access to all aspects of the DOC’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment to include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.” The facility provided a contract with an agency that can provide interpretive services in over 100 languages. A review of the Homeland Language Services website confirmed the information provided by staff. A memo on the new contract acknowledged the input from staff in improving the ability to serve LEP inmates. The Virginia DOC has a secondary contract with Purple, which can support inmates who use American Sign Language (ASL). The Auditor reviewed the documents to ensure they were current, and the facility provided records supporting that the contracts had been in place prior to the previous audit cycle. The Auditor was able to speak to any individuals who needed ASL assistance. The Intake staff were aware of the need to provide information in the individual's native tongue. The facility has Spanish materials available and will use formal interpretive services if bilingual staff are not available to assist in educating residents. The clinical staff also confirmed they could use interpretive services to communicate with inmates.

Indicator c). Some staff members interviewed knew that using one inmate to interpret for another was inappropriate. Staff knew it could only be done in the most extreme situations. The agency PREA policy (OP 038.3 (page 7) states, “Facility staff cannot rely on Inmate interpreters, Inmate readers, or other types of Inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender’s safety, the performance of first-response duties under, or the investigation of the offender’s allegations. Video Remote Interpreting (VRI) should be utilized to effectively communicate with deaf Inmates when American Sign Language interpreters are not available on-site.” The information provided in the OAS confirmed that there have been no incidents in which an inmate interpreter has been used to address any PREA-related concerns during this Audit cycle.

Compliance Determination:

	The Virginia Department of Corrections has in place supports that ensure individuals with disabilities and those who are LEP have a full understanding and capacity to use the information to protect themselves from sexual abuse, sexual harassment, or retaliation, and know how to report a concern. The DOC state PREA Coordinator is also the head of the ADA compliance unit, which ensures that PREA education and access to services for protected populations occur. This structure aids in identifying inmates' needs as they transition between facilities. The Auditor was able to view the documentation in both English and Spanish, the two most common languages spoken by the Virginia DOC population. The Auditor also confirmed the use of Just Detention International's video "PREA What you need to know," which is used as part of inmate education and is available in multiple languages. The facility has the necessary resources in place to provide professional translation services. The Auditor also confirmed with individuals with a variety of disabilities on their ability to receive support if they did not understand PREA or the agency's efforts. Inmates receive support, and staff are available to assist individuals who have hearing, emotional, or comprehension disabilities, as well as those with language barriers. Given the policy in place, the contracts, the staff, and inmate knowledge of accessing services, and the statewide support of the PREA/ADA Office, the Auditor finds that the standard expectations are being met.
--	---

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 102.2 Recruitment Selection and Appointment Policy OP 102.3 Background Investigation Program Policy OP 135.1 Standards of Conduct Policy OP 260.1 Procurement of Goods and Services Online application Staff employment records Individuals interviewed/ observations made. Interview with Human Resource Staff

Interview with Agency PREA Coordinator

Interview with Warden

Summary Determination

Indicator (a). The Virginia Department of Corrections policy, OP 102.2 Recruitment, Selection, and Appointment, addresses the requirements of this indicator in the section on employee eligibility. The Policy strictly prohibits the employment or contracting of the services of individuals who have engaged in, have been convicted of engaging in, or have attempted to engage in, or have been administratively adjudicated for sexual assault. The policy states, "Eligibility

1. The DOC will not hire or promote anyone for a position that may have contact with inmates, probationers, or parolees who has been: (§115.17[a], §115.217[a])

a. 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, Civil Rights of Institutionalized Persons);

b. Convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse, or

c. Civilly or administratively adjudicated to have engaged 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.

2. The DOC must consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates (§115.17[b], §115.217[b])

3. The DOC must ask all applicants and employees who may have contact with inmates, probationers, or parolees directly about previous misconduct described in paragraph a. of this section in written applications or interviews for hiring or promotions."

The Auditor reviewed the online application and found that these same questions are asked during the application process. In policy 260.1 Procurement of Goods and Services a similar requirement is documented.

"The DOC must not enlist the services of any contractor who may have contact with inmates or probationers/parolees, who: (§115.17[a,b], §115.217[a])

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 et seq. Civil Rights of Institutionalized Persons.

Has been civilly or administratively adjudicated to have engaged or 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.

The DOC must consider any incidents of sexual harassment in determining whether to enlist the services of any contractor, who may have contact with inmates or probationers/parolees. 115.17[b], §115.217[b])

The DOC must also perform a criminal background record check and any applicable drug test before enlisting the services of any contractor who may have contact with inmates or probationers/parolees. (§115.17[d], §115.217[d])”

Contracted staff were aware that they are subjected to criminal background checks. Interviews with HR staff support the screening process for all applicants for employment at the State Farm Correctional Center, including contractors and volunteers. The Human Resources staff confirmed that online applicants would be identified and that their names would be referred to the facility. If a person is selected for potential employment, the application is forwarded to the DOC's background investigations unit. This unit will run a series of criminal background checks (VCIN, motor vehicle, and Fingerprint checks), investigate prior employment, and search sex offender databases. Any approved volunteer undergoes the same screening process and the same acknowledgment form.

The employee application process requires potential candidates to confirm that they have not engaged in any form of the sexual misconduct described in indicator (a), including sexual assault in a prison or jail, any attempt to engage in sexual activity by force in the community or through coercion or engagement with an individual who could not consent. The Auditor confirmed the questions were asked at both the time of hire and promotional periods. In determining compliance, the Auditor reviewed files of new hires and individuals promoted. The Virginia DOC has had the PREA questions as part of the employment applications since 2014.

Indicator (b). The Virginia Department of Corrections subcontracts some of its medical and mental health services. The Virginia DOC policy prohibits the employment or contracting of individuals who may have engaged in behaviors described in indicator (a). The Auditor confirmed with the HR staff that the Virginia DOC performs criminal background checks on these individuals. The Policy states, “OP 260.1 Procurement of Goods and Services utilizes the same language requirements for contracted employees. “The DOC must not enlist the services of any contractor who may have contact with inmates or probationers/parolees, who: (§115.17[a,b], §115.217[a])

i. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile the facility, or other institution (as defined in 42 U.S.C. 1997 et seq. Civil Rights of Institutionalized Persons)

ii. Has been civilly or administratively adjudicated to have engaged or 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

iii. The DOC must consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates or probationers/parolees. (§115.17[b], §115.217[b])

iv. The DOC must also perform a criminal background records check and any applicable drug test before enlisting the services of any contractor who may have contact with inmates or probationers/parolees.”

The Auditor reviewed both DOC and contracted employees as part of this standards review process. The Human Resources staff confirmed that all individuals recommended for hire or promotion who have potential concerns in their work or personal history will be brought to the Warden’s attention before any offer of a position in the institution. Policy 102.2 describes in detail how prior employment checks and criminal offense histories are to be completed. As noted above, charges related to sexual offenses would preclude employment or volunteer services. The policy outlines the additional considerations the investigative unit must take into account when evaluating an applicant with a past criminal history. The Regional Director must approve these individuals.

The Department of Corrections' prescreening process for its employees and contractors seeks to find information on criminal offenses, and the agency does reach out to former employers for other behaviors that might have led to discipline.

Indicator (c). The Virginia Department of Corrections completes criminal background checks on all employees. The Agency's policy OP102.3, Background Investigation Program, covers the requirements of this standard. In discussions with the Human Resources staff and the Agency PREA Coordinator, these are consistently conducted as pre-employment screenings and at the required 5-year intervals, as indicated in indicator (e). The Check includes a criminal background check and prior institutional checks. Virginia law does not allow the criminal record to be maintained as part of the employee's file and reportedly requires the document to be destroyed after use. The human resources staff confirmed the process and demonstrated to the auditor how it was completed. The Auditor was provided with an example of criminal background documents. The Auditor, PREA Coordinator, and the Human Resources staff person discussed elements that must be maintained and ways to improve the documentation of check completion for future audits. The facility has hired 91 new employees in the past 12 months.

Indicator (d). As Indicator (a) states, SFCC completes criminal background checks on all contracted employees and approved volunteers. Contracted staff and volunteers support the fact that they were required to pass a background check before being allowed into the facility. Documentation of the criminal records screening was

provided along with the acknowledgment of their training on the responsibilities related to PREA. The facility has a limited number of contractors who work within the institution and have contact with inmates. Some of these individuals are employed in statewide positions and are not hired explicitly for the State Farm Correctional Center. These individuals have their background checks completed by staff from the DOC's central office or regional office. The Auditor confirmed that all current contractors and volunteers have had a criminal background check. The facility provided HR tracking documents indicating when criminal checks were initially completed and whether the contractor had been on site for more than 5 years, if a recheck was required. Virginia state law prohibits storing the actual record in the individual's HR file, documentation from the background unit states the elements considered before the individual is approved for employment.

Indicator (e). Discussions were provided with the Human Resources staff to ensure that staff undergo criminal background checks at the time of hire and at least every 5 years thereafter. As noted in indicator c), Virginia does not allow criminal record checks (VICN) to be maintained in its human resources file. The policy states, "The Human Resource Officer shall document in the Access Employee Database that the criminal records check (VCIN) was conducted." The Human Resources staff confirmed that the process is complete and that if new charges are identified, steps will be taken to notify the Warden. The Auditor requested and received additional documentation to support the process is being completed. As noted in indicator (c), the agency has a tracking system in place, consisting of a spreadsheet that records when criminal background checks have been completed on each employee and when they are due for re-screening if they do not apply for a promotion.

Indicator (f). As noted in Indicator (a) all SFCC employees are asked to complete the Employee Application, including questions required in Indicator a). After hire, the employees also complete a form titled PREA Mandatory Sexual Misconduct Disclosure. Staff are asked the aforementioned questions and are given a continuing responsibility to disclose such misconduct. The form states, "All answers and statements are true incomplete to the best of my knowledge. By signing this form, I am acknowledging that the information provided above is accurate and complete and that I have a continuing affirmative duty to disclose any such misconduct." The Virginia DOC required all existing employees who were employed prior to 2014 to complete the form. A review of random staff files supports that these questions are answered. The Human Resources Officer confirmed that promotional opportunities are treated no differently than new hires, so the application process (including PREA Questions) and criminal record checks would be completed again. They also confirmed the ability to review disciplinary records of applicants from other institutions. As noted, the Auditor visited the application site for the Virginia DOC to confirm that the questions are part of the online application.

Indicator (g). Policy OP 135.1 Standard of Conduct states “ Material omissions regarding convictions or charges of sexual abuse or sexual harassment in an institutional setting, sexual activity by force or coercion (or if the victim could not or did not consent), civil or administrative adjudication for sexual activity by force shall be grounds for termination.” Contained also in the PREA Employee Questionnaire is the following passage: “any material omissions regarding such misconduct, or provision of materially false information, shall be grounds for disqualification from employment or termination.” The PREA Mandatory Sexual Misconduct Form and the employment applications reviewed in staff files confirm the process is routinely done.

Indicator (h). With proper releases of information, the Virginia DOC allows the agency to disclose any PREA-related concerns to other institutions. Interviews with human resources staff confirm that they make requests to both internal and outside employers when hiring. The Human Resources staff member understood the importance of attempting to obtain information from previous institutional employers. If the department gets a request on a former staff member the PREA portion of the response is reviewed by the agency PREA Coordinator. The auditor requested and was provided documentation of requests for work records of former SFCC employees from another correctional center.

Compliance Determination:

The Virginia Department of Corrections has a policy in place to address the standards' requirements, including the completion of background checks and pre-employment screening, which supports the agency's efforts to screen out predatory candidates from employment. The Auditor interviewed the Human Resources staff at the SFCC to oversee the hiring. The agency has all staff and contractors undergo criminal background checks. The Human Resources staff reports that she works closely with facility management to maintain open lines of communication. The Virginia DOC has implemented policies and forms to document that staff have met the requirements related to the various indicators in this standard. The auditor reviewed a random selection while on-site to confirm that the practice was consistent with the policy.

The Virginia DOC has several policies that utilize the standard language to address the requirements. The Auditor reviewed several other policies related to the DOC website further to understand the process and the staff's obligations. Interviews with Human Resource staff and the PREA Coordinator further confirmed the process in place to ensure individuals who have engaged in sexual misconduct are not employed at State Farm Correctional Center or able to get a job at another correctional institution if that facility requests information. As outlined above, the auditor used several factors to determine compliance including the onsite review of staff records.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 801.1 Facility Physical Plant and Sanitation SFCC Camera Positions Warden Memo Individuals interviewed/ observations made. Interview with PREA Compliance Manager Interview with Deputy Warden Interview with the PREA Analyst Interview with Investigative Supervisor Observation on the tour Summary Determination Indicator a). The Virginia Department of Correction addresses Indicator a) in policy OP 801.1, which states, "The effect of the facility's design, acquisition, expansion, or modification on the facility's ability to protect the Inmate from sexual abuse shall be taken into consideration when designing or acquiring any new facility and in planning any substantial expansion or modification to an existing facility.". The Auditor was able to discuss with the Deputy Warden, CHAP, the PREA Analyst, and the PREA Compliance Manager how PREA safety concerns are addressed both at a facility level and how that information is also addressed at a state level. There have been no major renovations to the physical plant since the last PREA Audit, reportedly. The Auditor was able to tour the entire complex, during which the PCM, CHAP, and the Warden pointed out camera positions and how staff are to be positioned to maintain optimum supervision. Housing units have a direct supervision post with cameras, which are monitored by different individuals in the complex. The programming, classroom, and vocational areas are done, in smaller groups away from the housing units. An interview with the agency director's representative confirmed that all capital improvement projects should consider the safety of staff and offenders. The Deputy

	Warden supports the notion that during any modification, the agency should consider the lines of sight and staffing necessary to protect the population and staff effectively. Indicator b). The State Farm Correctional Center is the oldest of the dormitory housing model prisons for medium inmates in Virginia. The SFCC provided documentation in the OAS and leadership pointed out new camera positions since the last audit. The facility has also added body cameras since the last audit. The Auditor reviewed cameras that the facility administration had identified to reduce the risk of assault and improve inmate supervision. OP 801.1 states, "For new installations or updates to existing video monitoring systems, electronic surveillance systems or other monitoring technologies, the facility shall take into consideration how such technology may enhance their ability to protect Inmates from sexual abuse." The Auditor was able to discuss technology uses in the institution with the PREA Coordinator, Investigative team, Major, and the Deputy Warden. The facility has good camera coverage especially on the housing units, which aids the investigative process. The investigator showed how his staff can zoom in on bunk areas during an investigation. In investigative files the Auditor was able to see how camera reviews of both fixed and body cameras aided in the investigation process. The Auditor made recommendation for additional coverage including one area where a allegation took place. The post incident review team also made a recommendation on needed camera coverage. Compliance Determination: Virginia Department of Corrections has a system to consider inmate sexual safety in designing new spaces, modifying existing spaces, or adding monitoring technology. The Director of the Department of Corrections supports the agency's consideration of how physical plant modifications and the addition of monitoring technology can improve safety in Virginia's DOC facilities. Interviews with the Deputy Warden and the PCM confirms that all critical incident reviews consider physical plant concerns, staff allotment, and how monitoring technology could have impacted the event. The Auditor considered the policy and how the identified monitoring issues have been resolved to determine compliance. The Auditor also considered the interviews with the Warden, Major, Investigators, PREA Analyst, and PREA Compliance Manager in determining compliance. The interviews supported the idea that there are vital avenues of communication between the facility and agency administration to ensure appropriate resources can be applied to resolve identified concerns.
--	--

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

	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – 030.1 Evidence Collection and Preservation Policy – 030.4 Office of Law Enforcement Services Policy – 038.3 PREA Policy – 720.7 Emergency Medical Equipment and Care Policy – 730.2 MHS Screening Assessment and Classification Investigation Matrix Virginia Law 53.1 Powers of the Director Virginia Forensic Nurse Examiner Website Virginia Department of Criminal Justice Services Website MOU with Action Alliance IAFN Website Virginia Sexual and Domestic Violence Action Alliance website Warden Memo Individuals interviewed/ observations made. Interview with PREA Compliance Manager Interview with Random staff Interview with SANE/SAFE Interviews with Medical and Mental Health staff Interview with Rape Crisis Agency staff Summary Determination Indicator a). The Virginia Department of Corrections is responsible for both criminal and Administrative Investigations. The department has policy in place to ensure evidence is protected and that victims of sexual abuse can be transferred to an outside hospital for a forensic exam by a trained forensic examiner. Each facility has

staff trained in the completion of investigations, including sexual abuse incidents. If the initial information appears to support that a criminal act has potentially occurred, the Regional Criminal Investigator, who works out of the agency's Office of Law Enforcement Services (OLES), would be called. Virginia DOC policy 030.4 Special Investigation Unit sets forth the requirement that all allegations of sexual abuse be investigated. "VII. Prison Rape Elimination Act (PREA) Investigations

A. The Organizational Unit Head will ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

B. When the Organizational Unit Head receives notification from another facility that an inmate or CAP probationer/parolee was sexually abused while confined at that facility, they will ensure that the allegation is investigated in accordance with the PREA Standards

C. All allegations of sexual abuse and sexual harassment, including third-party and anonymous reports must be immediately reported to the facility-designated investigator who will conduct an initial investigation and will immediately notify the PREA Analyst of the allegation.

D. Unless the facility investigator quickly and definitively determines that the allegation is unfounded, allegations of sexual abuse or sexual harassment will be referred for investigation to the OLES which has the legal authority to conduct criminal investigations."

The policy goes on to state that the investigation will be conducted in a uniform manner.

"G. Evidence Protocol and Forensic Medical Examinations

1. OLES has an established uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

2. The established protocol is developmentally appropriate for youth and is based on or similar to other comprehensive and authoritative protocols developed after 2011."

Policy 030.1 Evidence Collection and Preservation also outlines the steps investigators must take to protect evidence, maintain the chain of command, and ensure crime scene integrity. This policy also addresses the collection, storage, and use of video evidence. The Virginia DOC completes all criminal and administrative investigations utilizing trained staff in the facility's investigative unit or OLES (Office of Law Enforcement Services) officers who conduct criminal Investigations. The OLES staff are law enforcement staff in the state of Virginia with full arrest authority. A review of state law 53.1-10 Powers of the Director includes the following passage, "To designate employees of the Department with internal investigations authority to have the same power as a sheriff or a law enforcement officer in the investigation of allegations of criminal behavior affecting the operations of the Department. Such employees shall be subject to any minimum training standards established by the

Department of Criminal Justice Services.” An interview with the PREA Analyst and facility Investigator confirms the training provided, ensuring all DOC investigators adopt a consistent approach to increase the likelihood of obtaining physical evidence. Random staff were able to describe the steps to protect evidence in a first responder situation until the investigator or a SANE could properly obtain it. The Auditor also reviewed the OLES Investigation matrix, which provides a visual aid to help understand how cases are transferred from the facility investigative team to OLES.

Indicator b). The Special Investigation Unit Policy also addresses the requirement of this indicator. The Auditor confirmed with the Investigator, the nurse in charge of Sexual Assault Examinations at the hospital on the protocol used for Sexual Assault Examinations. The Virginia Commonwealth University Health Services is listed on the state's SANE websites for nurse training programs. The OLES Investigator would not collect evidence as part of the forensic exam but is trained in working with victims of abuse and preserving crime scene evidence. Forensic nurses will complete the forensic exams at the local hospital. The representative confirmed that they use the protocols approved by the International Association of Forensic Nursing. A review of the IAFN Website confirms the use of the protocol, "Sexual Assault Nurse Examiner Education Guidelines, Adult and Pediatric" (updated 2018). The IAFN website also states, “We support the United States Department of Justice’s National Training Standards for Sexual Assault Medical Forensic Examiners (updated 2018), as well as the National Protocol for Sexual Assault Medical Forensic Examinations (Adult/ Adolescent)and (Pediatric).”

Indicator c). All victims of sexual abuse at State Farm Correctional Center could be taken to Virginia Commonwealth University Health Services in Richmond, approximately 30 miles away. An interview with hospital staff confirmed that the staff will use SAFE-trained nurses to complete forensic examinations of sexual abuse victims. Consistent with DOC policy 720.7 Emergency Medical Equipment and Care (page 8), it was confirmed that there is no examination cost. “If evidentiary or medically appropriate, Inmate victims of sexual assault are referred under appropriate security provisions to an outside facility for treatment and gathering of evidence.

1. A history is taken by a health care professional who will conduct a forensic medical examination to document the extent of physical injury. Sexual Assault will perform such examinations Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs), where possible. There will be no financial cost to the Inmate victim for this examination.”

The Auditor was able to see in investigative files, but none of the cases were for sexual assault that required the victim to be sent out for a forensic examination. The Nurse spoken to at the hospital also confirmed that the inmate would not be billed for services, but the cost is covered through the state's victims' services fund. They confirm that if a SANE Nurse is unavailable, a senior nurse or practitioner will

complete the exam. No inmates in the past year were seen in a medical hospital for an exam for potential sexual abuse. The Warden's memo also confirmed there were no cases in which a sexual abuse allegation resulted in a forensic exam at the local hospital.

Indicator d). State Farm Correctional Center has access to rape crisis agency staff through a Memorandum of Understanding with Action Alliance. The Virginia Department of Corrections has had an ongoing relationship with Action Alliance dating back to 2014. Action Alliance is the umbrella organization for state domestic and sexual abuse agencies. The Auditor was provided the original agreement and all subsequent renewals for services. In interviews with Action Alliance staff, the Auditor confirmed the relationship between the agencies. The PREA Compliance Manager and memo from the Warden confirmed that no individuals were taking advantage of any supportive counseling from an outside provider. The PCM confirmed the ability of victims to have professional visitation from a Rape Crisis Provider. Inmates were aware of the availability of mental health services at the facility.

Indicator e). State Farm Correctional Center has two policies addressing this indicator's requirements OP 038.3 PREA (page 13) and 730.2 MHS Screening and Assessment (page 8). Interviews with SANE nurses, the Action Alliance representative, and the facility's PREA Compliance Manager confirm the ability to support inmates during exams, criminal investigation interviews, or to provide ongoing support to victims. An interview with the Investigator confirms that a rape crisis support advocate would be offered to inmates. The Auditor also found the description of services in the MOU between VA-DOC and Action Alliance, which confirms supporting inmates at forensic exams or investigative interviews. The representative of the Action Alliance confirmed that supportive counseling would include a referral if the inmate was being transferred from State Farm Correctional Center to another part of the state.

Indicator f). The indicator is NA. The Virginia Department of Corrections and State Farm Correctional Center have trained individuals who are responsible for completing criminal and administrative investigations. The facility has trained investigators who can complete both criminal and administrative investigations. The Facility Investigation Unit will initially assess the event and gather any physical evidence. These staff are trained in the completion of investigations in the facility, including sexual abuse allegations. The state's Special Investigative Unit will take over all criminal cases of sexual abuse allegations and have the full capacity to pursue the case in the community if key individuals leave custody or employment.

Indicator g). The Auditor is not required to audit this provision

	Indicator h). The indicator is NA. The Virginia Department of Corrections has entered into an MOU with Action Alliance to provide support to victims of sexual misconduct at State Farm Correctional Center. Action Alliance would engage the assistance of the local Rape Crisis Agency if the facility can be served by a closer provider. Compliance Determination: The Auditor finds that the standard is compliant. The facility allows inmates access to victim advocates from a rape crisis center through a current MOU with Action Alliance. The facility provides inmate victims access to a Sexual Assault Nurse Examiner at no cost at the Hospital. The Auditor reviewed the agency's policies and procedures, Memorandum of Understanding, investigative reports, and spoke with hospital and rape crisis agencies to confirm the working relationship. The Auditor interviewed the State Farm Correctional Center's Investigator, hospital staff, and Action Alliance staff and reviewed multiple state and local websites related to services for victims of sexual assault.
--	---

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy - 030.4 Special Investigation Unit Policy - 038.3 Prison Rape Elimination Act (PREA) Agency Website Investigative Reports of Sexual Abuse and Sexual Harassment Allegations Virginia law- 15.2-1704. Powers and duties of the police force. Memo from Warden Individuals interviewed/ observations. Interview with Director Interview with Warden

Interview with Investigators

Interview with Inmates who made allegations

Summary determination.

Indicator a). The Auditor was provided with information on all sexual assault and sexual harassment claims made in the past year. Policy 030.4 Office of Law Enforcement Services (page 10) requires 'the Unit Managers to ensure administrative or criminal investigations occur on all allegations of sexual assault or sexual harassment.' The State Farm Correctional Center has investigated 7 allegations in the past year of sexual abuse or sexual harassment. The reports show a systematic review of evidence. The facility investigator reviewed video, telephone calls, and spoke to witnesses if time frames were given. One case was referred to the Office of Law Enforcement Services for potential Criminal Investigation. Interviews with the Department of Corrections administration and the Deputy Warden confirmed the expectation that all allegations be thoroughly investigated. The Deputy Warden discussed how they review these cases to ensure the reports have been completed and if related concerns have been identified. Random Inmates supported the belief that an investigation would occur for any allegation of sexual abuse or sexual harassment. The inmates stated that the facility takes allegations seriously and that they have access to supervisory staff, including upper management. The Auditor observed inmate interactions with the Deputy Warden, further supporting the approachability of facility leadership.

Indicator b). Virginia DOC Policy OP 030.4 Special Investigation Unit (OLES) sets forth the obligation that all cases of sexual assault and sexual harassment be investigated. The policy confirms that OLES staff have full police authority. The Auditor confirmed that the policy is on the VA DOC website, while also reviewing state law in Virginia, 15.2-1704, which defines the powers of police. As noted in the previous standard, Virginia law 53.1 allows the Director of Corrections to name an investigative force with full police powers. An interview with the OLES Investigator confirmed that the OLES agents who would investigate sexual assault criminal cases have the powers of arrest and authority to investigate crime in the facility, including the ability to continue the investigation even if the alleged perpetrator or victim has left employment or custody of the institution. The Facility Investigators also have the authority to investigate and collaborate with local prosecutors on criminal cases involving crimes that occur within the facility. The facility investigators will report immediately to the facility upon an allegation of sexual misconduct.

Indicator c). N/A - The Virginia Department of Corrections is responsible for Criminal Investigations at State Farm Correctional Center.

	Indicator d). The Virginia Department of Corrections is responsible for Criminal Investigations and Administrative at State Farm Correctional Center. Indicator e). N/A - The Auditor is not required to review this provision. Compliance Determination: The documents reviewed by the Auditor confirm the authority of the DOC investigators to investigate sexual abuse and sexual harassment allegations. The facility was able to document the cases they investigated. There were no current inmates in the population who filed any allegations of sexual abuse. The results included cases substantiated, unsubstantiated, and unfounded. These files were reviewed on-site, and the Auditor spoke with all of the in-house investigation team. The Auditor completed a phone interview with the OLES investigator. The volume of cases provided supports the notion that there are sufficient resources to complete them promptly. The Auditor also took into consideration interviews with the DOC Director, the investigator, and the Warden to confirm that all allegations of sexual assault and sexual harassment are investigated.
--	---

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy 102.6 Staff Orientation Policy 350.2 Training and Development State Farm Correctional Center staff training records In-service and pre-service Training Curricula PREA/ADA monthly newsletters Individuals interviewed/ observations made. PREA Compliance Manager PREA Analyst Random Staff

Summary determination.

Indicator a). The Virginia Department of Corrections provides annual training to its employees, including PREA, undue familiarity, emergency plans, and grievances, among other topics. The Auditor reviewed the training materials used to educate employees about PREA when hired and during annual refreshers. The training materials reviewed contained all 10 required elements of this indicator. Employees are trained, and random staff interviews help foster an understanding of the agency's zero-tolerance policy regarding sexual misconduct. Staff are told, "Any behavior of a sexual nature between employees and Inmates is prohibited. Employees are subject to a Group III offense under Operating Procedure 135.1 Standards of Conduct and may be prosecuted under the Code of Virginia." The Random staff were able to give examples of what they do in their daily jobs that help protect, detect, and respond to incidents of sexual misconduct. The staff reported awareness of the inmates' and staff's rights to be able to report a concern without fear of retaliation. Staff were aware of individuals at greater risk and the symptoms they learned in the training of individuals who might be victims of abuse. Interviewed staff provided examples of different reasons sexual violence may occur in an institutional setting. A portion of the materials covers staff standards of conduct, including avoiding fraternization with inmates, and the mandatory responsibility to report individuals who violate the policy. Staff members were also able to discuss what they learned about working with LGBTI inmates. Staff knew that transgender and intersex inmates have a search procedure and use of preferred pronouns when speaking with the inmate. Staff were able to provide various red flags for victims of sexual abuse, and could effectively explain how to respond to allegations of sexual misconduct. According to staff, the training is typically offered in a classroom setting during pre-service and annual training, with some online components. The staff are given updates as policies are adjusted, and the DOC's PREA/ADA unit publishes a monthly newsletter that refreshes staff on key issues in compliance. Policies on Staff Orientation (102.6) and Training and Development (350.2) cover the standard's elements.

Indicator b). The training materials are developed for statewide use; as such, the curriculum addresses working with male and female victims of abuse. State Farm Correctional Center has not had a transfer of any employee who had worked in a female-only environment in this audit cycle. Policy 102.6 language reinforces the DOC's expectation of gender-specific training: "Such training shall be tailored to the gender of the Inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male Inmates to a facility that houses only female offenders, or vice versa." Staff report materials related to PREA are routinely discussed as reminders in shift briefings.

Indicator c). The Virginia DOC trains individuals in PREA on an annual basis. Training records confirm information received through random staff interviews and informal

questions the Auditor asked of staff during the tour. The auditor reviewed the individuals' first training and the records from the last two years. As noted, the PREA Analyst and the PREA Coordinator confirmed that online education has also been used. In addition to formal training, staff are continually refreshed, both formally and informally, to support PREA issues during shift briefings.. The Auditor also reviewed the PREA/ADA newsletters, which go out via email to all employees.

Indicator d). The training records of 15 staff members were reviewed by the auditor, who confirmed that each staff member signed an acknowledgment form indicating that they understood the content of the training. Each employee must pass a test of their knowledge. The training supervisor reports that all employees must receive a 100% score or retake the questions the employee got wrong. This is done to ensure a full understanding of the staff's expectations in promoting a zero-tolerance culture and knowing how to prevent, detect, and respond to sexual harassment and sexual abuse claims. Random file reviews of over a dozen staff members consistently document that staff are trained. Further supporting compliance is that all new and seasoned staff can provide examples of the information covered in the training.

Compliance Determination:

The Auditor has determined that the facility has appropriately trained its staff in the areas required by this standard. The facility staff was well-educated in the training topics mandated by the standard, and they were able to provide examples of the Auditor's questions related to the ten required training elements. The Auditor reviewed facility policies and procedures, training curricula, materials, training rosters, and staff exams. In addition to training its staff, it also requires them to pass a test. The Auditor reviewed the information provided in advance to support staff education, as well as documentation from a random selection of staff. Current employee training records. The facility offers training more frequently than required by this standard, as it trains its staff on an annual basis. The PREA/ADA unit further supports ongoing training through the publication of a monthly newsletter that reinforces PREA topics and training modules.. Interviews with staff in different roles and different shift supported the consistent understanding of the zero tolerance culture. Staff were aware of the need to report all allegation no matter if they believe the validity of the complaint. They were able to describe signs of a potential victim, identify high risk population, and were aware of the consequences for inmates and staff who commit sexual abuse. The Auditor determined compliance based on the fact that the staff has retained the knowledge received from training, training materials, interviews with the State Farm Correctional Center and state leadership, and staff training records.

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 027.1 Volunteer Programming OP 038.3 Prison Rape Elimination Act OP 102.6 Staff Orientation OP 350.2 Training and Development PREA PowerPoint Contractor- Volunteer Training overview slides Guide to maintaining boundaries PREA Brochure for Volunteers Volunteer and Contractor Acknowledgment Forms Volunteer and Contractor lists Random Contractors and volunteer records Individuals interviewed/ observations made. Contracted Employee Interviews Volunteer Interviews Discussions with Contractors on tour Summary determination. Indicator a). The Virginia Department of Corrections and the State Farm Correctional Center have put in place a system to ensure all contractors and volunteers are trained regarding the inmates' rights to be free from sexual abuse, the agency's zero-tolerance policy for individuals who violate such, the potential criminal charges. Policy OP 350.2 states, "Contractors and volunteers with the DOC who have contact (or

could have contact) with Inmates shall be trained on their responsibilities to prevent, detect, monitor and report allegations and incidents of sexual abuse and sexual harassment of Inmates and probationers. (§115.32, §115.232)

i. 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 offenders, but all volunteers and contractors who have contact with Inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

ii. The facility shall maintain documentation confirming that volunteers and contractors understand the training they have received.

iii. See Operating Procedure 027.1, Volunteer Program, for guidance on volunteer training.

iv. See Operating Procedure 160.1, Staff Orientation, for guidance on contractor training."

Policy OP 027.1 also defines the background check to be similar to that of employees and contractors who have contact with inmates. The Auditor was provided a sample of the information that volunteers and contractors receive regarding the Prison Rape Elimination Act. Contractors who provide direct services to inmates, such as ASL interpreters, are provided more significant training than the individuals who are at the facility to make repairs. In addition to the materials presented, the Auditor considered interviews with contracted staff and volunteers, all of whom supported receiving training on the Prison Rape Elimination Act. The individuals spoken to understood and supported a zero-tolerance culture, and each person knew how to report a concern. The Auditor spoke with contracted employees who have little interaction with inmates and contractors who provide direct services on the tour or while moving about the facility. The facility has several groups that provide volunteer programming to inmates.

Indicator b). As noted in Indicator (a), the Virginia Department of Corrections provides significant training to both its contracted and volunteer staff pools. The auditor confirmed that contractors and volunteers are educated on understanding the zero-tolerance culture, how to avoid inappropriate relationships with inmates, and how to report concerns. SFCC has limited contracted individuals who provide direct service to inmates after the healthcare staff became state employees. The facility has 80 approved volunteers as part of an approved list for the facilities in the area. Documentation supports that they have attended class. The Auditor was provided with a sample of 14 files showing education about the Prison Rape Elimination Act is provided and that the training includes. The Auditor interviewed the chaplain and 2 volunteers who were on site during the audit. The volunteers confirmed that they have been trained and knew to speak to the shift commander or the chaplain if a resident disclosed abuse or fear about sexual misconduct

	Indicator c). The Auditor was able to review the training records of contractors and volunteers. Individuals signed initial orientation forms upon first entering the facility, and those who provide ongoing services are listed on training rosters. Compliance Determination: The State Farm Correctional Center has implemented a multi-level training approach for contracted employees and volunteers, tailored to the level of contact with inmates. Individuals with more direct and frequent contact receive the same training from the department on PREA and how to report a concern. Training materials and records support the process to ensure that all individuals who come to the facility are educated on inmates' rights to be free from sexual abuse, sexual harassment, and retaliation for reporting any such misconduct. The education materials reviewed confirmed that individuals were informed of their requirement to report any knowledge or suspicion of such misconduct. The Auditor finds that the SFCC complies with the standard's expectations. The determination was based on the materials reviewed, existing policies, and formal and informal interviews conducted.
--	---

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP-383.3 Prison Rape Elimination Act. Policy OP-810.2 Transferred Inmates and Receiving Operations Zero Tolerance Postings Detainee Training Outline PREA Video Inmate Acknowledgment Forms Staff outline for Intake education Individuals interviewed/ observations made.

Interview with Intake Staff Person

Interview with Unit case managers

Interview with inmates

Observation on a tour of PREA Signage in two languages

Observation of PREA Video in English and Spanish on inmate TVs.

Summary Determination

Indicator (a) All inmates are provided information about PREA upon admission to State Farm Correctional Center. The inmates have often been exposed to PREA through the county jail system or other VA DOC facilities before their admission to SFCC. At intake, inmates report being provided with a description of PREA, instructions on how to protect themselves, guidance on reporting concerns, and information on the services available to victims. An explanation of the admission process was provided to the Auditor during the tour, including the information that the intake officer routinely covers related to PREA. The Auditor also sat for a formal interview with a staff member who completes admissions. As a long-term facility with required classification criteria, the State Farm Correctional Center inmates have all had prior education on the DOC's zero-tolerance stance toward sexual abuse, sexual harassment or retaliation for reporting such behaviors. Inmates are provided with information in documents and a video on how to report a concern. Inmates at SFCC receive information and sign acknowledgment forms on how to report at the facility before being assigned a unit on the day of admission. The auditor observed PREA information in each housing unit. Every housing unit also had contact information for the PREA Compliance Manager and the regional PREA Analyst. The facility provided information stating 100% of the 792 admissions received education on PREA upon admission. The inmates interviewed all supported that they received information upon admission.

Indicator (b) All inmates at SFCC are met with to review facility-specific information, including PREA, with their caseworker in the first few days in the facility. On date of admission, they are provided all aspects of the comprehensive PREA Education as they are almost all transfers from other DOC facilities. The education includes the Virginia Department of Corrections' zero-tolerance policy toward sexual abuse or sexual harassment. The 5-page training curriculum tells inmates how to protect themselves from sexual assault/sexual harassment, how to and why it's important to report a concern, the inmates' rights related to PREA, and their right to be free from retaliation if they make a report. They are given an understanding of the steps DOC will take to investigate and support individuals in the event of an incident. Random inmates confirmed education into PREA. Inmates confirmed verbally in the interviews that they had received education about PREA and how to report a concern. The 792

inmate admissions held over 72 hours in the last 12 months were provided education upon admission to SFCC. A review of provided and spot-checked files, training documents, and inmate interviews supports compliance with the indicator. The Auditor reviewed 20 files while at the facility to confirm acknowledgment forms and verify that clients were educated upon admission, as confirmed through targeted and random resident interviews. Inmates did acknowledge that they know what PREA is, how to report a concern, that things will be investigated and that there are resources internally and externally to aid victims of sexual abuse.

Indicator (c) All State Farm Correctional Center inmates have received an education on PREA and how to report any concerns. Inmate education is documented, and random inmates confirmed that PREA was addressed immediately upon transfer from their prior prison or jail. No inmates were housed at the State Farm Correctional Center prior to the implementation of the PREA law. Many random inmates pointed to signage in the units that educated inmates about PREA, Agency Policy OP-810.2 Transferred Inmates and Receiving Operations (page 4) requires "An Inmate received from another institution via transfer will be provided a copy of the appropriate Zero Tolerance for Sexual Abuse and Sexual Harassment brochure that includes the Sexual Assault Hotline number ". Inmates at SFCC have all been educated on PREA at other DOC facilities prior to their transfer to SFCC.

Indicator (d) Education is available in multiple languages and forms, from written documents to large print documents, in addition to video. Inmates support the idea that they can approach staff if they need assistance with the comprehension of written or oral PREA education. The assistance is available to any individual who requires support, including those with physical disabilities, cognitive limitations, or those who struggle with reading. Many inmates stated that PREA was not a concern, but they acknowledged that the information was available and noted that some people could assist, including line officers, case managers, unit managers, the PREA Compliance Manager, or by dialing #55. Many of the inmates have been incarcerated for over 10 years in multiple facilities, but reported sexual abuse or harassment is not something they see or have to deal with at SFCC. The Auditor saw PREA Information in two languages during the tour. The Auditor also viewed Inmate orientation books in English and Spanish. The nationally recognized PREA video is available in multiple languages and features closed captions for the hearing-impaired. The facility is exploring the feasibility of playing the PREA Video on tablets or the TV system, as found in other DOC sites. Inmates were able to confirm that there is multiple ways where those with cognitive challenges, language barriers can receive help from other inmates, staff, supervisor and case workers.

Indicator (e) As noted in indicator (b), the Auditor reviewed documentation supporting inmate education across the past year. The auditor also requested a random selection of files supporting compliance with the documentation of PREA

education. This supports that they have received PREA education. Agency policy takes the additional step of requiring that if any audit of the inmate's file does not contain written proof of education, the inmate must undergo reeducation immediately. Inmates spoken to both formally and informally during the tour knew about PREA, the DOC Zero Tolerance stance toward sexual abuse, and how to report a concern. Inmates understood the internal procedures for reporting concerns and how to contact individuals outside the DOC.

Indicator (f) Agency Policy OP-810.2 Transferred Inmates and Receiving Operations states, "Each institution will ensure that key information is continuously and readily available or visible to Inmates through posters, Inmate handbooks, or other written formats." Observations throughout the tour indicate that materials are continuously available to inmates. The information viewed included handbooks, posters, and other signage about PREA, as well as resources such as the local rape crisis agency.

Compliance Determination

PREA is a term familiar to inmates at SFCC. The Virginia Department of Corrections Policy OP 038.3 PREA-Prevention sets forth the expectation of timeliness in inmate education, the manner in which education is delivered, and the requirement for materials for LEP and disabled inmate education. Inmates at SFCC confirm that they are educated on PREA and the zero-tolerance expectations as soon as they arrive at the facility. PREA information is reviewed with the inmate by the Intake Officer, and they are provided an inmate handbook that contains information on PREA. The information reviewed is signed by the inmate and placed in their case record. The facility has PREA educational materials available to inmates in the form of brochures, posters, and a brochure. As noted, almost all SFCC residents were educated about PREA in other DOC facilities prior to their transfer. The orientation process also includes viewing the Virginia Department of Corrections-approved PREA video. This video is available in multiple languages. Inmates have access to documents that can be translated into multiple languages as needed.

During the tour, the Auditor saw posters informing inmates about reporting PREA events or accessing advocacy services. Inmates report they are given facility-specific PREA information within one day of admission. Inmates sign at admission to acknowledge their PREA education. Interviews with inmates confirm they know how to report incidents if they were to occur. Inmates reported comfort using #55 to report a concern or file a grievance if they were to experience or be a witness to an incident of sexual abuse or harassment. During interviews with inmates, they expressed several ways to contact the administration or outside individuals if they were uncomfortable telling the line staff. Many of the inmates stated that PREA was not a concern at the SFCC. They reported that any complaint would be taken seriously and investigated. Inmates with disabilities confirm that if they have a need, staff will assist in understanding materials.

The compliance determination considered the supporting educational documents,

	the postings viewed about the facility, the inmates' answers regarding training, and their knowledge of facility-specific steps for reporting concerns. Further supporting compliance is the Auditor's review of inmate records, which revealed their educational background, the inmate education training materials, and the videos used for educational purposes.
--	--

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 030.4 Special Investigations Unit Policy OP 350.2 Training and Development Training for Institutional Investigators (PowerPoint) NIC Investigator Training Investigation Matrix OLES facility Investigator Training records Documentation of ongoing refreshers offered by the PREA Office Individuals interviewed/ observations made. Interview with OLES agent Interview with SFCC Intel Officer Interview with the Regional PREA Analyst Summary Determination Indicator (a) The Virginia Department of Corrections employs its own investigative body. The Department of Corrections employs Office of Law Enforcement Services (OLES) Detectives, who are official law enforcement agents with full powers of arrest in Virginia. The Virginia DOC uses a Agent who handles criminal investigations by region and who is required by policy OP 350.2 Training and Development, "Sexual abuse and sexual harassment investigations shall only be conducted by investigators

who have received special training in sexual abuse investigations. In addition to the general PREA training provided to all employees, facility investigators shall receive specialized training in conducting sexual abuse investigations in confinement settings.

Specialized training shall include:

- i. Techniques for interviewing sexual abuse victims
- ii. Proper use of Miranda and Garrity warnings
- iii. Sexual abuse evidence collection in confinement settings
- iv. Criteria and evidence required to substantiate a case for administrative action or prosecution referral.”

As such, DOC Detectives have received training in conducting investigations in accordance with Virginia statutes and DOC policy. The Department of Corrections has a cadre of 19 trained staff members trained on how to complete sexual assault investigations of the correctional setting. In addition to OLES, the facility’s Intel Officer has also completed specialized training on investigating PREA allegations in the facility. The Intel Unit will handle allegations that are not criminal in nature. They will respond to all allegations to ensure, in the case of a criminal act, that the scene and evidence are protected until the criminal investigator arrives. The staff interviewed supported an understanding that the training they had received had prepared them for completing sexual abuse investigations in DOC Facilities. Training documents and interview support materials are provided to VADOC staff to take the online NIC course for investigators. The department developed has developed ongoing training which include focusing on completion of PREA Investigations. These courses have occurred in three of the last 5 years and has included OLES trainers and representative of the state’s prosecution department. State Farm has two trained investigator and a supervisor who walked the auditor through file reviews and confirmed the training that has be provided.

Indicator (b) As noted above, the Virginia Department of Corrections has two training resources to ensure staff understand how to complete sexual assault or harassment investigations in a correctional setting. The Agency utilizes both the National Institute of Corrections online course PREA: Investigating Sexual Assault in a Confinement Setting and the developed course. The Agency course, reviewed by the Auditor covered all the relevant topics required by this standard. The interview with a trained investigator and an intel staff member confirmed the training covered how to communicate with a victim of sexual assault, the use of Miranda and Garrity Warnings, proper steps in the collection and preservation of evidence, and the factors in making a determination of substantiation for administrative action or prosecutorial referral. The Investigator and Supervisor were able to discuss the practical application of the training in their work in completing sexual misconduct investigations.

Indicator (c) Training records were provided for onsite staff who completed investigations and for certified staff from throughout the Department of Corrections who would complete criminal and administrative investigations at SFCC, including the investigator interviewed by the auditor. Policy OP 030.4 Office of Law Enforcement Services (page 10) states, "The PREA Compliance Manager shall maintain documentation that the investigators have completed the required specialized training in conducting sexual abuse investigations." The institutional investigator's interview confirmed their training. A staff person in the intel unit has also been trained on completing sexual abuse investigations in a correctional center. Non-criminal investigations will be completed by the facility Investigator or intel officer unless the allegation involves a staff person; then, an OLES agent will be assigned. The Auditor reviewed investigative files with the investigators to get an understanding of the process and how they have implemented the information from the training. The Auditor reviewed the two SFCC staff training records, and the OLES agent information was also provided. The Auditor saw initial training records dating back to 2016 and refreshers as recent as 2025.

Indicator (d) The Auditor is not required to review this indicator

Compliance Determination:

The Virginia Department of Corrections ensures that staff who complete investigations have received appropriate specialized training on investigating sexual assault in a correctional setting. The facility investigator at State Farm Correctional Center has been trained to complete investigations. The Agency employs criminal investigators in the Special Investigation Unit (OLES) who have full police authority. Documents and interviews support the fact that the facility's investigators are trained in the requirements of a PREA-related investigation. Given the number of DOC-trained PREA Investigators, the level of professional investigative training provided to the staff, and the interview with the facility's trained Investigator, the Auditor finds the facility meets the standard expectations. The investigations reviewed were complete, demonstrating many of the aspects covered in the training. The interview with the Investigative Supervisor and informal discussions with staff confirm training on completing sexual abuse and sexual harassment allegations at SFCC. The Investigator was able to discuss the application of training in the review of the files. The training documents further supported the Auditor's findings, indicating that the facility and state have sufficient resources to conduct investigations into issues of sexual misconduct.

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy 102.6 Staff Orientation Policy 350.2 Training and Development Policy 701.1 Health Service Administration Policy 720.7 Emergency Medical Equipment and Care NIC Courses for Medical and Behavioral Health Staff on Working with Victims in Corrections NIC Certificates PREA Response Plan Individuals interviewed/ observations made. Medical Staff Mental Health Staff VCU Medical Center Richmond Summary Determination Indicator (a) The State Farm Correctional Center employs the services of state-employed medical and mental health providers. The facility trains staff using National Institute of Corrections courses on PREA-specific considerations, incorporating input from medical and behavioral health staff. Included in the training materials were details on how to recognize signs and symptoms of abuse, communicate effectively with a victim, report an allegation, and preserve evidence. Interviews with nursing staff support awareness that they should not clean any injuries and only treat critical health concerns before transport to the hospital for a rape kit. Healthcare staff knew who to report PREA concerns to within the DOC and their supervisory chain. Supporting documentation included the facility's PREA response plan. Contracted healthcare employees are required to complete the same training as VA DOC

healthcare staff. The Auditor also saw how the agency was able to have employees complete training while the NIC course was unavailable. VA DOC policy OP 701.1 covers the standard expectation for the content of specialized training for healthcare staff. "The Health Authority and/or Institutional Training Officer will document that all full and part-time health services staff who work regularly in DOC facilities receive specialized training in: (§115.35[a, c], §115.235[a, c])

1. How to detect and assess signs of sexual abuse and sexual harassment.
2. How to preserve physical evidence of sexual abuse.
3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment.
4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

OP720.7 also confirms the staff will be trained in responding to victims of sexual assault.

Indicator (b) The medical staff does not complete a forensic exam. Discussions with regional medical facilities confirmed the availability of trained nurses to perform sexual assault exams. From SFCC, inmate victims would be taken about 30 miles to the main Virginia Commonwealth University Health Center in Richmond. Medical staff confirmed there would be notification to the hospital that the victim was in route. The VA DOC has a unit at the Hospital for its patients. They acknowledge they will protect evidence during their initial evaluation with an alleged victim and complete follow up care upon return from the forensic exam including notification to mental health services for support.

Indicator (c) Documentation was provided to the Auditor for the healthcare staff confirming the specialized training was completed. The Auditor reviewed the training materials and considered the staff's knowledge of the materials. The training materials and staff knowledge were consistent with standard expectations on protecting evidence in a sexual abuse incident. The auditor was provided several documents showing healthcare staff are trained in responding to sexual abuse allegation.

Indicator (d) A review of the training record and the interview with staff confirms that all staff received the same training as the DOC employees annually, as well as the training described in 115.32. DOC training records further support compliance. Policy 102.6 states, "Medical and mental health care practitioners must also receive the

	training mandated for employees or contractors and volunteers depending upon the practitioner's status in the DOC." The facility provided information on NIC training completed by both the medical and the mental health professionals. Concluding Determination The state employs medical and mental health staff at Virginia DOC facilities. SFCC Healthcare staff are employees who have taken the required specialized course through the NIC and can attest to the information they learned. The Auditor is familiar with the course content, having reviewed it in previous audits. The training materials and interviewed staff supported that they were trained in how to respond appropriately to sexual assault victims. The Auditor met formally with healthcare staff and was able to ask questions of other staff on the tour. Medical and Mental Health staff knew to whom to report allegations and suspicions of sexual abuse or sexual harassment. They were able to explain that the reporting would be up to their agency's chain of command, while also notifying the prison's chain of command. Medical and mental health staff were also instructed to report any concerns to the Department of Corrections investigators or the PREA Compliance Manager. The contracted staff reported they also take the same PREA classes from the Virginia DOC as state employees. Medical staff will not conduct forensic medical examinations, but they are aware of how to protect evidence and which facilities they would refer inmates to for an exam by a SAFE or SANE, if needed. The Auditor determined compliance based on policy, interviews, and the review of the training programs for Medical and Mental Health staff. The Auditor also took into consideration the coordinated response plan and the availability of SAFE nurses in the local hospital.
--	--

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 730.2 Screening Assessment and Classification Policy OP 810.1 Inmate Reception and Classification Policy OP 810.2 Transferred Inmate Receiving and Orientation Policy OP 861.1 Inmate Discipline

Classifications screening description

Classification Screenings

Reassessments

Memo of LGBTI Perception

Individuals interviewed/ observations made.

PREA Coordinator

Healthcare staff.

Intake and Screening staff

Deputy Warden

Unit Managers

Observation on tour

Summary Determination

Indicator (a) All Virginia Department of Corrections inmates who are admitted or transferred to State Farm Correctional Center are assessed with an objective screening. This requirement is outlined in policy OP 810.1, which states, "Within 24 hours of arrival, prior to bed assignment, a Classification Assessment will be completed in VACORIS for each new Inmate entering the DOC and housing assignments made accordingly." The policy goes on to state, "Utilizing the results of the Classification Assessment in VACORIS and available Inmate records, staff will screen the Inmate for potential vulnerabilities or tendencies for acting out with sexually aggressive or other violent behavior, and will interview and evaluate the Inmate for High-Risk Sexual Aggressor (HRSA) and/or High-Risk Sexual Victim (HRSV) tendencies." Policy OP 810.2 outlines the same requirements for inmates transferred to the DOC system. "A Counselor or other non-clerical staff member will assess each inmate, upon transfer from one DOC institution to another, for their risk of being sexually abused by other inmates or sexually abusive toward other inmates." By design, the State Farm Correctional Center population has all transferred in from other Virginia DOC institutions. The Auditor selected a random population sample that supported screening occurring upon transfer from DOC facilities or if the admission was from a county jail. The records reviewed support screening occurring on a consistent basis within the first 24-48 hours. Most admissions are scheduled at State Farm Correctional Center and the Auditor was able to see groups being processed on the tour. The initial PREA Information is given in a small building just inside the sallyport gates. The Intake Sergeant described the process of education and initial information gathering which will be reviewed further by classification.

Indicator (b) The Policy, as stated in indicator (a), sets forth an obligation for the screening to be completed sooner than the standard requirement. The Virginia DOC requires the screening to be completed in the first 24 hours. The Policy states, "The Classification Assessment must be completed and approved within 72 hours of the inmate's arrival at the institution and will include a review of the following factors: (§115.41[b], (§115.41[c], §115.41[e])

- a. History of assaultive behavior
- b. Potential for victimization
- c. History of prior victimization
- d. Special medical or mental health status
- e. Escape history
- f. Age
- g. Enemies or inmates keep separate information
- h. Any other related information

The review of the screening reports supports that this practice standard is met. The Auditor requested a random sample of files to compare to the report provided on the timing of the screenings and reassessments. The Intake Counselor confirmed that screening is done as part of the admission process. The inmate is asked questions directly, and the inmate's criminal and institutional records are reviewed to determine. The staff person walked the Auditor through the intake process, describing the process, including where the interviews take place and what questions are asked. The facility reports that there were 792 admissions in the past year, and that 100% of the screenings were completed within 72 hours. The facility had provided in the online Audit System documentation of multiple screenings completed monthly over the past year. The Auditor reviewed a sampling of the population files while on-site. The Intake counselor confirmed the intakes are done the same day unless the transport does not arrive until the evening then they are completed the next morning.

Indicator (c) The tool developed for screening inmates for potential sexual violence or sexual victimization is an objective tool utilizing information from the inmate's criminal records, information from other correctional settings, and the inmate's self-reported information. The agency provided the Auditor with the materials for administering and scoring the tool to ensure the application was objective. The screening information has been put into VACORIS, an electronic case management system. The Auditor also asked the Intake officer to show the process by which the questions were asked. Files were reviewed in advance of the audit, and the Auditor requested a random sampling of files on-site. Random inmates were asked questions

to confirm that the screening process did occur, including if they were asked directly about their sexuality, victimization history, and their perceived safety from sexual abuse. The system identified HRSA (high risk for sexual aggression) and HRSV (high risk for sexual victimization), along with the scoring, which was also provided. The reports showed all individuals classified in either category.

Indicator (d) The Virginia DOC Policy states the following regarding the PREA screening process. "The Classification Assessment must be approved within 72 hours of the inmate's arrival at the institution and will include a review of the following factors: (§115.41[b], §115.41[e])

- a. History of assaultive behavior
- b. Potential for victimization
- c. History of prior victimization
- d. Special medical or mental health status
- e. Escape history
- f. Age
- g. Enemies or inmates keep separate information
- h. Any other related information."

A review of the objective tool used in Virginia DOC facilities shows that it accounts for all 10 elements required in this indicator. As noted in indicator (b), policy language covers the required questions that the state expects to be considered in determining the risk of sexual victimization. A review of the objective tool used in Virginia DOC facilities shows that it accounts for all 10 elements required in this indicator. The Agency PREA Coordinator explained to the Auditor the process by which all elements are weighted for the scoring process, resulting in a determination of either High Risk for Victimization or High-Risk Aggressor. Files were reviewed in advance of the audit, and the Auditor requested a random sampling of files on-site. The Auditor reviewed the electronic screening system, and the facility printed out the screening questions and results from VACORIS.

Indicator (e) The Virginia DOC screening tool does consider the offender's history of violence or sexual abusiveness in the community and prior institutional settings. The PREA Compliance Manager and the counselor interviewed about screening reports would determine if the Inmate had an incident in the current institution; if so, they would be reassessed, which could change their scoring. The agency screening guidelines remind staff that Inmates can be both a high risk of being a victim of sexual abuse (HRSV) and a high risk of being a sexual aggressor (HRSA). The agency's practice is to follow the guidelines of HRSA when an inmate scores positive

for both status measures. The Auditor also reviewed the HRSA/HRSV screens from VACORIS (the state's electronic case management system) when identifying the target population for interviews.

Indicator (f) The VA DOC policy 810.1 requires assessment within 21 days instead of the standard required of within 30 days. The Policy states, "Within 21 days from the offender's arrival at the institution, staff will meet with the Inmate and will reassess the offender's risk of victimization or abusiveness based upon any additional, relevant information received by the institution since the intake screening.

i. The PREA Reassessment must be completed no sooner than 14 days and no later than 21 days after the offender's arrival at the institution.

ii. Completion of the Reassessment must be documented as a PREA Reassessment in the Facility Notes section of VACORIS.

iii. The PREA Reassessment will be scanned and uploaded as an external document to the corresponding PREA Reassessment note.

The Auditor was able to review the report and inmate files to ensure compliance with the standard. The files reviewed confirmed that the reassessments were completed within the 30-day period. The auditor found the screenings ranged between 14 and 21 days. The Auditor finds that this is done on a paper system that is subsequently uploaded into VACORIS. The files reviewed on site were completed within the policy guidelines, which is nine days before the standard's requirement. The facility reported in the OAS that 100% of the 792 inmates who stayed 30 days were reassessed.

Indicator (g) The Auditor was able to conduct formal interviews with staff and review documentation to support PREA reassessments, which occur for several reasons. The inmate would be reassessed if they were either the victim or the perpetrator of sexual violence if they engaged in consensual sex in violation of facility rules if additional information becomes known that would affect the scoring. Policy OP 730.2 Screening Assessment and Classification states, "An offender's risk level must be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the offender's risk of sexual victimization or abusiveness." The Auditor also discussed with the counselor about reassessments that are based on new information, including if someone discloses information about prior abuse or their sexual identity. Inmates supported the idea that they were asked questions at the reassessment point, and the population was discussed regularly with the unit management team. The Auditor also discussed with mental health and medical staff how communication would occur if an inmate disclosed information in these settings differently than at the intake. The parties understood that past victimization and one's sexuality might be disclosed more easily in a clinical setting.

Indicator (h) The Auditor confirmed that inmates are not disciplined for refusing to answer questions or disclosing information during the screening process. The Auditor spoke with the intake staff who completed the initial screening and the case managers who completed the reassessment. A random sampling of inmates also confirmed that you cannot get in trouble for not answering these questions. Virginia DOC policy 810.2 Transferred Inmate Receiving and Orientation states, "Staff must not discipline inmates for refusing to answer or for not disclosing complete information in response to questions asked in the Classification Assessment interview.'

Indicator (i) The Virginia Department of Corrections completes the screening information in its electronic case management system. The system limits access to screening information, particularly the inmate's more sensitive information. Disclosures made in the Medical or Mental health record are completely siloed from the custody staff. Limited information is shared through the Unit management structure to ensure safety, but critical information that could be used to exploit an inmate is kept to a select few individuals. The VACORIS system can generate a report identifying who is on HRSA or HRSV without providing specific information about the reasons why. This allows for Supervisory staff to make informed decisions about housing moves, programming, or work assignments without having to disclose if the inmate was a victim previously of sexual abuse or if the score was given as a culmination of other factors scored.

Compliance Determination:

The State Farm Correctional Center ensures all inmates are screened for sexual victimization and abusiveness using an objective tool. The policy requires that all inmates be screened initially within 24 hours and reassessed within 14 to 21 days. The Agency also requires periodic rescreening by using the PREA assessment instrument in CORIS. This is also done when warranted due to a referral, request, incident of sexual misconduct, or receipt of additional information that bears on the prisoner's risk of sexual vulnerability or sexual violence. CORIS is the Virginia DOC electronic case file system that links records as inmates move between facilities.

Virginia DOC developed the objective tool and has clear guidelines for its use. The tool accounts for all factors required in indicators (d) and (e). They have also implemented a system to ensure that after the initial screening, the inmates are asked about sexuality, victimization history, and perceived safety. The Intake officer who was spoken to confirmed that inmates cannot be punished for refusing to answer questions about sexuality, prior victimization, and vulnerability. The Auditor also confirmed this with inmates as part of the formal interviews. Interviews also confirmed that a limited number of staff, administrators, and treatment professionals are aware of the reasons behind PREA scoring results in CORIS. Unit Management team members were aware of inmate screening and the importance of using the information. Medical staff will also ask for PREA-related information during the initial

	assessment and pass any new information back to the intake staff to ensure the screening encompasses all information obtained at intake. Compliance was determined based on the random sample screens reviewed on-site, along with the files provided in advance in the OAS. The documents were consistent with the standard's content and timeliness requirements. Interviews with staff and inmates further support the idea that the appropriate questions are being asked. The Virginia DOC policies incorporate PREA Screening into multiple policy expectations. The Auditor also took into consideration that Medical and Mental Health staff knew that disclosures of information that could impact scoring should be reported to the appropriate leadership, who could adjust the scoring, such as the PCM or the Unit Managers.
--	---

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 038.3 Prison Rape Elimination Act Policy OP 810.1 Inmate Reception and Classification Policy OP 810.2 Transferred Inmate Receiving and Orientation Policy OP 830.5 Inmate Transfer and Reassignments Policy OP 841.1 Inmate Programming and Services Policy OP 425.4 Management of Bed and Cell Assignments Inmate Classification Screenings HRSA and HRSV screening Warden Memo on screening use Individuals interviewed/ observations made. Interview with State PREA Coordinator Interview with PREA Compliance Manager Interview with Intake Officer

Interview with Unit Manager

Interview with Random Staff

Interview with random inmates

Population report

Observation on tour

Summary Determination

Indicator (a) The DOC PREA policy OP 038.3 addresses prevention efforts and covers the 5 elements of this standard indicator (Pages 6-7). The PREA screen used at SFCC provides immediate assistance in determining the appropriate housing unit and bed placement for any new Inmate. If an individual is a known perpetrator of sexual offenses, they would be prohibited from being placed in the same bunk area as an individual with a known victim history. Individuals who are likely to be victims in the institutions can be considered for being bunked individually. Unit staff, in collaboration with a multidisciplinary team, determines when an inmate is ready to transition to either work or educational programming. During these team meetings, a potential conflict would be identified between the known individuals on each side. Staff in education and work settings confirmed they are provided with information to ensure inmates with victimization histories are kept apart from potential perpetrators of sexual violence. The policy states, "Facility staff will use information from the offender's Classification Assessment in determining appropriate housing, bed, work, education, and program assignments with the goal of keeping separate those Inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Staff will make individualized determinations about how to ensure the safety of each offender." The PREA screen used at SFCC provides immediate assistance in determining the appropriate housing unit and bed placement for any new admission. If an individual is a known perpetrator of sexual offenses in an institution, they would be prohibited from being placed in the same portion of unit as an individual with a known victim history. The shift commander would reportedly place individuals who are likely to be victimized in bunks closest to the housing officer and the overwatch position. The Warden's memo describes his expectation on managing these individuals in the intake pod and if they both qualify for the veterans pod. State Farm Correctional Center has residents in open dorm units with four columns of bed. The center of the room has a cement half wall and with a walkway between each column and across the rear of the room. The bed closest to the overwatch are single level with the rear of the room having bunk beds. Through a multi-disciplined team, unit staff determines when an inmate is ready to transition to work or programming. The team would review where a potential conflict would be identified. The Auditor was provided with examples of the report available in VACORIS that breaks out individuals who score as high risk for sexual aggression or being victimized. The Auditor asked for the facility to provide a narrative document describing how the information obtained is used to protect individuals from sexual abuse. The Warden provided a

document outlining his expectations for the use of screening information at various points during the inmate's stay, as well as the parties responsible. Descriptions from multiple leadership staff support the intentional placement of housing and bunk assignments, as well as the continued assessment of inmate safety in work, education, and programming.

Indicator (b) Safety of the inmates is considered throughout the inmate's stay. Unit management allows inmates to be grouped in smaller subsets within the pods where the staff can focus on their needs and learn their behavioral norms. The staff interviewed identified the importance of being able to identify when the behaviors change. The random inmates reported they could reach out to the unit manager or other leadership if they had any individual needs/concerns. Interviews with staff also confirmed they would act if the inmates voiced concerns. During the initial screening process, inmates are asked about their perception of safety by custody and healthcare staff. Inmates also have the opportunity to discuss concerns with mental health staff and case management staff during the reassessment period. The Institutional Program Manager reviews all out-of-pod assignments to ensure there is no conflict between those identified as High-Risk Aggressors and those who are High-Risk Victims.

Indicator (c) This provision has been suspended from consideration and will not be part of the compliance determination for this standard.

Indicator (d) This provision has been suspended from consideration and will not be part of the compliance determination for this standard.

.

Indicator (e). This provision has been suspended from consideration and will not be part of the compliance determination for this standard.

Indicator (f) This provision has been suspended from consideration and will not be part of the compliance determination for this standard.

Indicator (g) This provision has been suspended from consideration and will not be part of the compliance determination for this standard.

	Compliance Determination: Virginia DOC Policy OP 038.3 Prison Rape Elimination Act described the use of the PREA Screening tool in Indicators (a) and (b). The remaining Indicators are covered in Section 425.4, Management of Bed and Cell Assignments, and in Policy OP 830.5, Inmate Transfer and Reassignment. The Virginia Department of Corrections has multiple level of determining an individual's appropriateness for each institution in its system. The State Farm Correctional Center is a medium security facility. highly aggressive individual would unlikely classify as eligible for this setting. All individuals entering SFCC are asked about their safety concerns, which helps guide the placement process for housing and, ultimately, programming. The Virginia Department of Corrections asks questions in its intake screening process at each facility which informs a tool which provides an automated objective scoring of their risk of sexual violence of sexual aggression Documentation and interviews support that inmates at greater risk will be housed in units without sexual aggressors, or they will often be housed closer to staff and have to provide the best lines of sight and increased ability to monitor interactions. The Auditor finds that practices are in place to use screening information, and there is good communication about those at risk. The Auditor also took into consideration interviews, the existing policy language, and the random documents provided.
--	---

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 425.4 Management of Bed and Cell Assignments Policy OP 810.1 Inmate Reception and Classification Policy OP 830.5 Transferred Inmate Reception Policy OP 861.1 Inmate Discipline Policy OP 730.2 MHWS Screening, Assessment, and Classification Protective Custody screening form

Individuals interviewed/ observations made.

Interview with the PREA Coordinator

Interview with Deputy Warden

Interview with Staff in Restrictive Housing Unit

Interview with the PREA Compliance Manager

Observation on tour

Summary Determination

Indicator (a) The State Farm Correctional Center refrains from placing inmates at high risk for sexual victimization in involuntary segregated housing. Policy OP 425.4 allows, consistent with the standard for protective custody housing, a period of 24 hours to assess the situation. DOC policy states, "Inmates identified as HRSV or Inmates alleged to have suffered sexual abuse or sexual harassment will not be placed in the restrictive housing unit without their consent unless an assessment of all available alternatives has been made, and it has been determined by the QMHP in consultation with the Shift Commander and Regional PREA Analyst that there are no available alternative means of separation from likely abusers." SFCC administration reports that there have been no cases of protective custody for individuals at risk of sexual abuse in the past three years. The Auditor also confirmed this with staff working at the RHU. Virginia DOC Policy 830.5 further addresses the intended limitation on the use of Protective Custody for those at potential risk of sexual abuse. "Lesbian, gay, bisexual, transgender, or intersex offenders will not be placed in the Protective Custody Unit solely based on their identification or status." State Farm Correctional Center does not have a Protective Custody Unit and will not use restrictive housing except exigent circumstances to ensure the inmate's safety. The facility has multiple units where residents with conflicts can be separated, and the management team can use information to keep these individual apart in programming, work, education eliminating the need to limit access to these or other privileges.

Indicator (b) Since it is not the practice of the State Farm Correctional Center to place individuals in involuntary segregation as a means of providing protection from sexual abuse, the elements of indicator (b) are difficult to assess. The DOC policy states, "The institution must clearly document the basis for the institution's concern for the offender's safety and the reason why no alternative means of separation can be arranged.

i. A Sexual Abuse/Sexual Harassment Available Alternatives Assessment must be completed by the Shift Commander prior to placing the Inmate in a restrictive housing unit.

ii. If the Sexual Abuse/Sexual Harassment Available Alternatives Assessment cannot be conducted immediately, the Shift Commander may place the Inmate in a restrictive housing unit on General Detention for up to two hours while completing the assessment.

iii. A copy of the completed Sexual Abuse/Sexual Harassment Available Alternatives Assessment must be sent to the Regional PREA Analyst immediately upon completion with a copy maintained in the PREA Investigation file.”

The policy goes on to state the following on access to programming. “If access to activities and services is more restrictive for Inmates identified as HRSV or who have alleged to have suffered sexual abuse or sexual harassment than for others in their housing status, staff will document the opportunities that have been limited, the duration of the limitation and the reasons for such limitations on the Denial of Activity or Service.” The Auditor was provided with a copy of the Alternative Assessment form which can document in exigent circumstance, reason for placement in RHU and document the plan of access to routine programming or an alternative solution. As noted, the agency policy has systems in place to provide protective measures to a victim of sexual abuse or those determined to be at imminent risk. The facility does not routinely house those with risk scores in RHU and would likely move known aggressors to a higher custody level facility.

Indicator (c) The Department of Corrections has a policy, OP 425.4 Management of Bed and Cell Assignments, that addresses the requirements of this standard in protecting inmates and staff who report PREA incidents from retaliation. The policy requires SFCC not to house victims or those at risk in segregation as a form of protection, unless there are no other means available, and the situation is reassessed every 30 days. The policy states, “Inmates will remain in the restrictive housing unit only until an alternative means of separation from likely abuse can be arranged; this assignment will not ordinarily exceed 30 days.”

Indicator (d) Since SFCC has not used segregated housing to achieve protective custody of individuals at risk of sexual misconduct in the past three years, there is no documentation to review other than a blank Alternative Assessment form.

Indicator (e) The Department of Corrections has a policy (Policy OP 830.5 Transfers and Reassignments) that addresses the requirements of this standard in protecting inmates and staff who report PREA incidents from retaliation. The policy requires SFCC not to house victims or those at risk in segregation as a form of protection, unless there are no other means available, and the situation is reassessed every 30 days. The policy requires regular review by staff and Mental Health professionals, as well as communication with the Regional PREA Analyst. The Mental Health Staff and Institutional Program Manager confirmed that the reassessment of the inmate’s needs

	would be ongoing if they were required to use protective custody to ensure safety from sexual assault. Compliance Determination Interviews with the Warden and the facility's PREA Compliance Manager confirm that the facility has not had to use involuntary segregation to ensure the safety of any victims of sexual assault. The Warden confirms that the aggressor would be the individual moved to segregation or a higher level of custody. An interview with an LGBTQI inmate affirmed that they were not held in administrative segregation as a protective condition. Investigative reports support that there is no segregation of victims, which is consistent with the Deputy Warden's interview. In addition to discussions with the inmates, staff, and administration during the tour, the disciplinary segregation staff confirmed that no individual was in the unit for protection from sexual assault. The standard is compliant based on the information provided, the tour, the interviews, and the facility's policy and practice.
--	---

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 038.1 Reporting Serious or Unusual Incidents Policy OP 038.3 Prison Rape Elimination Act Policy OP 803.3 Inmate Telephone Services Policy OP 801.6 Inmate Service Policy OP 866.1 Inmate Grievance Policy OP 940.0 PREA Brochure Inmate orientation book Inmate PREA Video PREA Posters In multiple languages Action Alliance MOU

Individuals interviewed/ observations made.

Interview with Random Staff

Interview with Contracted staff

Interview with Random Inmates

Observation on a tour of Reporting information

Summary Determination

Indicator (a) The Virginia DOC has multiple policies that address the concerns of this standard indicator through the creation of multiple internal and external ways a inmate can report sexual misconduct of staff or residents including retaliation of those who cooperate in investigations. The policies direct staff and inmates on the ability to report sexual harassment, sexual abuse, or staff neglect that contributed to abuse. PREA Policy 038.3 provides an overview of the entire reporting process, while the other policies address using the phone, filing a grievance, or completing a request form as options for reporting a concern. Policy 038.3 states, "Inmates and CCAP probationers/parolees can report sexual abuse and sexual harassment, inmate and CCAP probationer/parolee retaliation for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents to any staff member including chaplains, medical, mental health or counseling staff, security staff, or administrators."

Staff interviewed knew they had to report all allegations of abuse or harassment and any coworker's action or inaction that led to sexual misconduct against an inmate. Random interviews confirmed that the inmates know there are multiple ways to report a concern within the facility, such as dialing #55 or calling the Department of Corrections Central Office. Inmates knew of the postings and options to report a concern, including directly to a staff they trust, to any case manager or medical or mental health staff, by writing the Warden, or by calling the PREA 'hotline' (#55). There was signage observed throughout the facility in both English and Spanish, the most common languages spoken in the facility. The signs provided directions for internal and external reporting, including mailing addresses. The inmates at State Farm Correctional Center come from other state facilities where they have been offered PREA education. The posting tells the inmates of ways to report a PREA concern internally and externally. Signage was easily understood, including how to use #55 to report to an external agency or to speak to a supportive outside counseling service through the rape crisis service provider. The Auditor also saw grievance boxes accessible to inmates where PREA complaints could also be filed. The auditor tested the reporting system on multiple units, making calls to the outside reporting mechanism, which forwarded the information to the Virginia DOC PREA Office. Inmates knew they could not only report abuse but any retaliation for

reporting a PREA incident or a staff's actions that allowed abuse to occur. The auditor suggested that the facility consider playing the PREA Video on the TV or tablet, as he had seen it at another VADOC institution. SFCC is in the process of getting DOC issued tablets for inmate use. Inmates can access the PREA Hotline on unit phones. Inmates in all units confirm they have access to supervisory staff who come through the units to be able to report a concern. Residents can report staff actions or inactions that lead to sexual assault or sexual harassment to supervisors directly, to the facility investigator, to the Warden or through the grievance process.

Indicator (b) The Virginia Department of Corrections has set up a way for inmates to report a PREA concern to an outside agency. The phone numbers to access the local rape crisis agency Action Alliance are painted on walls prominently in each housing unit. The PREA poster was available to residents with the Action Alliance address if they do not feel comfortable reporting to DOC staff. Inmates were aware of these options and stated they could call attorneys or family members to report a concern. The inmates were also confident that if a family member called to report a concern, the staff would take it seriously and investigate it. The Action Alliance has set up reporting and separate emotional support lines with the DOC. The Auditor tried the # 55 line from a housing unit which prompts you to either press 1 to report a complaint or 2 to speak with a rape crisis advocate. The Auditor called the Hotline, and the state PREA Coordinator confirmed he received a notification. The Auditor confirmed with Action Alliance that the reporting process allows them to report all concerns while allowing the individual to remain anonymous. By allowing the inmate to report a concern separate from seeking emotional support, they can report the complaints to the DOC for investigation. The inmate is not required to enter any identifying information to access the reporting or emotional support lines. The State Farm Correctional Center does not house inmates for immigration violations. Inmates confirmed that they can speak directly to staff they trust. They also confirm that the Unit managers and custody Supervisor are through the units and can be spoken to in a private setting. Resident knew they could write the Warden or other leadership directly about a concern and that they had access to writing implements and stationery to write letters or grievance forms. The auditor saw residents interact with facility leadership during the tour. The Auditor saw investigation files that were initiated by calls to the hotline that are reported to the PREA Office. Inmates know that they can write individuals internally or externally and that if they do not have funds for external mail indigent inmates can request stamps and envelopes to allow communication. The Auditor did require that a mailbox be moved inside the supportive living unit to receive grievances, internal and external mail. Most Inmates in the facility have access to mailboxes off the unit as they travel across campus. Inmates in the Supportive Living Unit have medical concerns and as such do not leave that area and had to ask staff or another inmate who helps on the unit to mail the item for it. The Deputy Warden agreed with the solutions and the mailbox was moved inside where residents could have better access. The Auditor confirmed that mail from rape crisis agencies is treated like legal mail and is given to them by the investigator who can watch them open the letter.

Indicator (c) Policy 038.1 Reporting Serious or Unusual Incidents states, "Staff must accept reports made verbally, in writing, anonymously, and from third parties and must promptly document verbal reports as an Internal Incident Report with PREA checked in the description field." Interviews confirm that it is consistent with agency policy that all staff take any report of a PREA-related incident seriously and report the concern to a superior or the facility investigator. Random staff knew that they had to report the claim no matter the source of information, including anonymous notes. The staff reported that any claim needed to be reported and documented in writing, even if they thought it did not occur. Finally, the staff also confirmed they had to report the actions or failure to act of a fellow employee that led to a sexual assault. In the investigation files reviewed by the auditor, there were investigations started by written and verbal statements. The Auditor also found examples of inmates using the hotline and grievance systems to report concerns. The facility provided all 7 investigation files from State Farm Correctional Center and information on an OLES case as documentation to support compliance. Inmates confirm that there are no rules preventing them from reporting on the behalf of another inmate who may be too afraid to report a concern.

Indicator (d) The Virginia Department of Correction provides several avenues for staff to report a concern of sexual assault or sexual harassment. Beyond reporting an incident to their immediate supervisor, if the staff had a concern about the supervisor or another staff member being involved with an inmate, they reported it to another supervisor or a higher-ranking individual. They can make a report using either the posted phone numbers of Human Resources, the facility's senior leadership, or the Virginia DOC PREA Coordinator. Staff interviews confirmed they were aware of multiple avenues to report a concern. Interviews with staff support they knew they could report out of the chain of command without consequences. Agency PREA Policy 038.3 provides the above-stated options on page 14. "Staff, contractors, volunteers, and interns can privately report the sexual abuse and sexual harassment of inmates and CCAP probationers/parolees through the established reporting hotline at 855-602-7001. The policy goes on to state, "Staff, contractors, volunteers, and interns must report to the supervisor, Organizational Unit Head, or Shift Commander any suspicion or knowledge of other staff, contractor, volunteer, or intern fraternization with inmates and CCAP probationers/parolees; see Operating Procedure 135.2, Rules of Conduct Governing Employees Relationships with Offenders."

Compliance Determination:

The Virginia Department of Corrections has several policies that provide staff and inmates to promote reporting. Interviews with staff were consistent in their understanding of their duties of accepting and responding to all reports of sexual assault or sexual harassment, whether it was done verbally, in writing, anonymously, or by a third party (indicator (c)). Inmates interviewed were aware of multiple ways in

	which they could report, including telling staff, calling the hotline, mailing administration or the rape crisis agency, completing a grievance form, or calling or writing the local rape crisis agency. Inmates reported the sexual abuse or sexual harassment were not areas they felt they needed to worry about. Posters directing inmates to call or write Action Alliance are seen on all the housing units during the tour. Inmates spoken to formally and on tour reported comfort in reporting via the #55 system, but most reported that PREA is not a concern at SFCC. Custody staff reported knowing how to privately report PREA concerns to the administration and that there is no problem reporting out of the chain of command. The Auditor finds compliance based on the policy, documentation provided and viewed on the tour, the interview findings of random staff and inmates, and interview information from the Action Alliance representative, PREA Compliance Manager, and PREA Coordinator. The Auditor's successful testing of the reporting systems further supported compliance, as did the investigative files. The Auditor also considered the facilities expedience in resolving the Auditor's concerns about access to a mailbox for those individuals in the supportive living unit.
--	--

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 038.3 Prison Rape Elimination Act Policy OP 861.1 Inmate Discipline Policy OP 866.1 Inmate Grievance Memos from Warden Inmate Orientation Manual DOC Website Individuals interviewed/ observations made. Interview with facility PREA Compliance Monitor Interview with Regional PREA Analyst

Interview with Warden

Interview with Grievance Officer

Interview with Random Inmates

Observation on tour

Summary Determination

Indicator (a) The State Farm Correctional Center is not exempt from the standard; inmates can file a grievance on conditions that violate their rights or prison rules. Sexual misconduct is a reason for which an inmate can file a grievance. Virginia DOC policy states, "The Inmate Grievance Procedure is one of the multiple internal ways for Inmates to privately report sexual abuse and sexual harassment, retaliation by other Inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents." The Auditor was able to review a PREA sexual Abuse allegation filed through a grievance form. Agency policy requires the education of residents on the grievance process, including the location of boxes in the facility and the schedule for their pickup. Postings were visible in common areas, including visitation, where families and attorneys can access information, including information on third-party grievances that can be filed through the PREA Office. This information is also available on the agency's website. Agency grievance policy 866.1 contains specific language about PREA-related grievances. Discussions with the facility's grievance officer confirmed that inmates have the right to file a grievance related to sexual abuse. The staff confirmed that there were no formal allegations of sexual abuse in the past year through the formal grievance process. All grievances that relate to sexual abuse or harassment are immediately turned over to the Intel unit for investigation and to the facility's PREA Compliance Manager. The Grievance Officer reports they handle about 25-35 grievances per month but received no grievances related to sexual misconduct.

Indicator (b) Agency policy and inmate handbooks support the idea that the inmate can file a grievance to a person who is not the subject of the grievance, and there is no requirement to resolve the situation through an informal process. Agency policy OP 866.1 Inmate Grievance sets forth language consistent with the standard. The policy denotes when there is a deviation from standard grievance to conditions that need to be met, specifically in PREA-related grievances. A review of the policy (page 7) it confirms in the section entitled Timeline for Submissions that sexual abuse allegations are not subjected to time constraints for reporting. "There is no time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse or sexual harassment." The standard grievances at SFCC are required to be filed within 30 days of the incident. The policy also states there is no obligation for the grievant to have an informal resolution meeting with the party who sexually assaulted or harassed them. "PREA Exception to Informal Complaint Process

1. An Inmate is not required to use the informal complaint process or otherwise attempt to resolve with staff any alleged incident of sexual abuse or sexual harassment. (§115.52[b(3)])
2. Staff must accept all Inmate allegations of sexual abuse and sexual harassment reported through the informal complaint process and must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to the Facility Unit Head and the PREA Compliance Manager. (§115.51[c]).
3. Staff must forward Written Complaints alleging sexual abuse or sexual assault to the PREA Compliance Manager for investigation; the written response must be "This matter has been forwarded for investigation to the PREA Compliance Manager." The PREA Compliance Manager must notify the Regional PREA Analyst." Inmates were aware that they were able to file a grievance related to a sexual misconduct concern.

Indicator (c) The facility has large mailbox system where inmates can submit confidential letters to the grievance officer, PREA Compliance Manager, the Warden, or any other leadership staff. Grievances can be filed in a sealed envelope given to staff if the inmate is restricted to housing. Inmates can direct the mail to the appropriate administrator, who will forward it to investigators and the grievance officer. Inmates interviewed reported grievances as the fourth option they would use to report a concern after the PREA Hotline #55, speaking to a staff they were comfortable reporting or dropping a note. The grievance Officer was aware that the inmates that inmates could file through the administration if they were the subject of the complaint.

Indicator (d) Policy OP 866.1 Inmate Grievance Sets forth the requirements for response and appeal consistent with the standard. The Grievance response times are spelled out in the policy. The Policy also has specific language regarding Sexual misconduct allegations received through the grievance process. Staff report that though the inmate may grieve a concern at a routine grievance, the facility will treat the concern on a more expedited process through a formal investigation that would commence immediately.

"Special Concerns during the Intake Process

- a. Staff must accept all Inmate allegations of sexual abuse and sexual harassment reported on a grievance and must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to the Facility Unit Head and PREA Compliance Manager. The PREA Compliance Manager must notify the Regional PREA Analyst. (§115.51[c])
- b. Staff must bring any grievance alleging physical assault or criminal activity to the

attention of the Facility Unit Head immediately upon receipt.

c. Staff must not return a Regular Grievance concerning an offender's medical care to the Inmate for Insufficient Information. Staff must forward these grievances to the Medical Department once logged.

d. Staff must not return a Regular Grievance alleging sexual abuse or sexual harassment for insufficient information. Staff must forward these grievances to the PREA Compliance Manager once logged."

At SFCC, grievances related to sexual misconduct are referred to the investigator, and the inmate is notified of the change in process. The facility PCM or Investigator and not the Grievance Officer will notify the inmate of the outcome of the investigation. If an inmate files an appeal, they would be referred to the PCM and the Investigator because the Grievance Officer would not necessarily have access to the investigation materials.

Indicator (e) The grievance policy states inmates may be assisted in filing the grievance by any staff person or by any other person with whom the prisoner is permitted to have contact. Policy 866.1 Inmate Grievance Procedures states, "Third Party Assistance - Third parties must be able to assist offenders in completing grievances relating to allegations of sexual abuse and sexual harassment and must be permitted to file such requests on behalf of offenders. (§115.51[c],§115.52[e])

a. If a third party files such a request on behalf of an offender, the offender must agree to have the request filed on their behalf.

i. If the offender does not agree, staff must document the decision, and the grievance must not be accepted.

ii. If the offender does agree, assistance from fellow offenders or staff members may continue through all stages that remain.

b. Any third party filing of a request related to allegations of sexual abuse or sexual harassment must be forwarded to the PREA Compliance Manager."

The Auditor reviewed how the agency handles third-party complaints, including grievances. Such a person may also file the grievance on behalf of the prisoner or inmate, provided that the prisoner or inmate consents to the filing. Inmates spoken to by the Auditor confirmed that there is no prohibition on assisting or filing a grievance for another inmate. Staff were also aware they needed to accept all complaints or grievances from third-party individuals. Visually, the Auditor found information about the facility, telling all parties that they could file a complaint.

Indicator (f) Policy OP 866.1 describes the provisions for emergency grievance. "Emergency Grievances are provided for Inmate reporting and expedited staff

responses to allegations that an Inmate is subject to a substantial risk of imminent sexual abuse and to situations or conditions which may subject the Inmate to immediate risk of serious personal injury or irreparable harm. It is the duty of all corrections employees to be responsive to emergency grievances.” The forms have tracking numbers to allow for systematic review by the administration and prevent them from being diverted. There were no grievances in the last 12 months related to sexual abuse or sexual harassment complaints filed as an emergency grievance. As noted in indicator (b), there is an immediate notification to the PCM and the Investigator, at which time an immediate assessment of the inmate's safety occurs. This will be documented in the grievance form, which is part of the investigation file. There were no allegations of sexual abuse filed as a regular or emergency grievance in the past year.

Indicator (g) Inmates can only be disciplined if, through an investigative process, it is substantiated that the grievance was filed in bad faith. This is the same standard for all PREA complaints filed, even if they have not been filed through the grievance process. The facility grievance form has a location in which the Grievance Officer can document if he believes the individual is abusing the intent of the grievance process. An OLES Agent or the Intelligence Unit investigation would still occur to determine the bad-faith filing. The policy states, “Disciplinary charges may be brought against an Inmate for filing a grievance related to alleged sexual abuse only where the institution demonstrates that the Inmate filed the grievance in bad faith. The regional PREA Analyst and the facility confirmed they are very careful before imposing discipline as it may prevent others from coming forward to report a PREA Concern.

Compliance Determination

State Farm Correctional Center is not exempt from the exhaustion of administrative remedies. The Virginia Department of Corrections has a policy covering inmates' rights to seek administrative resolutions. There were no instances in which an emergency grievance was filed related to sexual abuse in the past year. Inmates interviewed knew they could file a PREA-related concern through the grievance process but acknowledged it would not be as quick to resolve as telling a staff person directly or calling the PREA Hotline. Inmates report they can get assistance from other inmates in completing forms if needed. Compliance determination relied on the policy and interviews with the PREA Analyst, the Warden, the PREA Compliance Manager, the grievance officer, and random inmates who were aware of the grievance process as an avenue to report sexual misconduct concerns.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 038.3 Prison Rape Elimination Act MOU with Action Alliance Action Alliance Website Individuals interviewed/ observations made. Interview with Agency PREA Coordinator Interview with Warden Interview with Action Alliance staff Interviews with Random Inmates Observation on tour Summary Determination Indicator (a) Virginia Department of Corrections policy OP 038.3 Prison Rape Elimination Act requires the agency ensures a current MOU with a rape crisis organization. "The DOC maintains a Memorandum of Understanding (MOU) with a community service provider who is able to provide Inmates with access to free, confidential emotional support services related to sexual abuse. A copy of this agreement is available from the PREA/ADA Supervisor." The State Farm Correctional Center provides access to the local rape crisis agency. Action Alliance will provide phone support and will assign staff or work with other local providers if the inmate requests face-to-face support. The Agency's employees are considered professional visitors status, allowing for confidential communication. Inmates can communicate by phone to Action Alliance utilizing #55 on the unit phones, which will not record the conversation. State Farm Correctional Center does not house inmates on immigration violations. The resident knew there were services available through mental health, or they could call #55. Some inmates were unclear about the counseling capacity of the Action Alliance hotline, stating they didn't worry about PREA. The inmates knew they could report using #55, but some were less clear about the support option. The Auditor explained

option #2 when dialing #55 to inmates with less familiarity who acknowledged they did not pay attention because they have no concerns about PREA. Inmate's report having received the same training at other Virginia DOC facilities before transferring to SFCC. Virginia DOC has a universal process for reporting and getting outside emotional support across all its facilities.

Indicator (b) All inmates interviewed understood that calls to the Hotline would be reported back to the institution if they clicked option 1. If an inmate dials #55 and chooses option two, they can have confidential communication that will not necessarily be reported. All SFCC inmates sign acknowledgment forms with health care staff as part of their introduction to service for both medical and mental health services. Inmates also confirmed they understood communication with mental health staff would be confidential unless there was a danger to themselves or another person. Inmates were aware the phone calls were not recorded if they called the rape crisis agency. The Auditor confirmed that inmates and advocacy organizations are allowed professional visit opportunities. The auditor tested the phone system on multiple units to ensure the phone worked and was able to get through to the counseling hotline. The Auditor also spoke with volunteers who provide religious activities who knew that disclosures of inmates being victimized in the facility must be reported.

Indicator (c) The Department of Correction has a Memorandum of Understanding with Action Alliance covering State Farm Correctional Center. The agreement is renewable. The Auditor was able to review MOUs dating back to 2014 and the annual renewal of the contract from 2015 through 2025. Because of the distance, Action Alliance would work with a local rape crisis agency to provide onsite support in person for victims if requested. Phone confirmation with hospital staff confirms that an Action Alliance member agency advocate would be allowed to do hospital accompaniments.

Compliance Determination:

Inmate victims at SFCC can access victim advocates for emotional support. The agency has entered into a Memorandum of Understanding with the Action Alliance of Richmond, Virginia, to provide support to victims (Indicator (c)). Action Alliance is part of a Coalition of Sexual Assault and Domestic Violence Services. As part of the audit process, the Auditor spoke by phone to an Action Alliance representative who confirmed their ability to provide service at DOC facilities directly or through its network of partners. The Agency Investigator knew about the importance of offering the support of Action Alliance and its affiliates during the investigation and after its conclusion. The PREA Brochure and signage at the facility had a toll-free number for inmates to access from the unit phone in the facility.

Requirements for compliance with this standard are covered by agency policy OP 038.3 Prison Rape Elimination Act. In determining compliance, the Auditor also

	considered interviews with the Rape Crisis agencies and the Inmates who understood they could access services. Inmates could identify how confidential the communication is within the facility, including mail and telephone contacts. Inmates knew that an outside counseling staff could typically be spoken to in a professional visiting setting. During the tour, the auditor could see posters for Action Alliance as well as the painted numbers on unit walls to contact them. The auditor tested the critical functionality of inmates' ability to access Action Alliance on multiple units. The calls are not monitored and can be made without using their inmate number. Mail can be dropped in the box near the dining, and outside living units and the residents confirmed access to indigent mail if they do not have funds.
--	--

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Pre-Audit Questionnaire Policy OP 038.3 Prison Rape Elimination Act Virginia DOC Website (third-party reporting) Action Alliance Website PREA Posters on Housing units information of the PREA report Hotline forms for third-party reporting investigative file Individuals interviewed/ observations made. Interview with Agency PREA Coordinator Random Staff Interviews Observation on tour Summary Determination Indicator (a) The Virginia Department of Correction has developed a mechanism for

individuals who want to report PREA concerns as a third party, be they fellow Probationers, family, or friends. Information can be given in person, by phone, email, US mail, or by contacting the agency PREA Coordinator through the agency website VADOC.Virginia.Gov. There is information directing Probationers in the PREA brochure, PREA poster, and on the website noted above. The staff was aware that they must take all reported concerns about PREA potential violations, including third parties. The facility phones allow inmates to dial out to the advocates free of charge. The agency PREA policy addresses the standard, "Third parties including other offenders, staff members, family members, attorneys, and outside advocates are permitted to assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse, and are also permitted to file such requests on behalf of offenders.

a. If a third party files such a request on behalf of an offender, the alleged victim must agree to have the request filed on their behalf as a condition of processing the request. The alleged victim will also be required to personally pursue any subsequent steps in the administrative remedy process.

b. If the offender declines to have the request processed on their behalf, facility staff must document the offender's decision.

c. Contact information on how to report sexual abuse and sexual harassment on behalf of an offender is provided on the DOC public website."

The SFCC has had no reported external third-party reporting of sexual misconduct concerns. The facility can receive an anonymous allegation. Signage in the facility and information in the inmate handbook and on the website supported informing individuals about third-party reporting. The PREA Office tracks all calls from third parties or ones received through Action Alliance. Families and other interested parties can access the Virginia DOC website <https://vadoc.virginia.gov/general-public/prison-rape-elimination-act-reports/> where information on how to report a concern is listed including a phone number to the PREA Office and a form that can be submitted.

Compliance Determination:

Virginia Department of Corrections has put in place multiple resources for inmates and families to report a PREA-related concern. The PREA Office is responsible for fielding all calls and emails, including third-party sources. The critical functions were tested by the Auditor while on site. As part of the audit process, the PREA Auditor tested the unit Phones to ensure the phone numbers on the poster could be accessed. Compliance is based on policy and the systems that the VA DOC had put in place to support the inmates. Random staff interviews further supported compliance as they knew they needed to report all third-party complaints regardless of source. The inmates interviewed confirmed they could report a PREA concern on behalf of another resident. The Action Alliance also has information for residents and family members on its website on filing a PREA concern or how to access assistance. There was one third party allegation received through the inhouse mail system which led to an investigation. Finally, the Auditor considered the options listed on the state's

	website for filing a PREA Complaint and the annual report delineating the number of calls by region and facility.
--	---

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.1 Reporting Important or Serious Incidents OP 038.3 Prison Rape Elimination Act OP 730.2 MHS Screening, Assessment, and Classification OP 801.6 Inmate Services Memos on third party reporting, DSS and medical and Mental Health Incident reports documenting the source of the complaint Virginia Department of Social Services Website Virginia Laws on Vulnerable Adults Documentation from investigative files. Individuals interviewed/ observations. Random Inmates Random Staff Deputy Warden SFCC Investigator Medical and Mental Health Staff PREA Compliance Manager

Summary determination.

Indicator a). The State Farm Correctional Center has trained its staff, contractors, and volunteers on the importance of reporting all allegations of sexual abuse, sexual harassment, and any forms of retaliation against individuals who reported or cooperated in an investigation of such misconduct. Several policies direct staff on such expectations. PREA policy OP 038.3 (page 5) utilizes the language of the standard to set forth this expectation. It reads, "Any employee, volunteer, or contractor shall immediately report to their supervisor or the officer in charge 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 DOC; retaliation against Inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation." Policy OP 038.1 reenforces the requirement. "Employees, Contractors, Volunteers, and Interns: Must immediately report any knowledge, suspicion, or information on the following to their supervisor or the Shift Commander: (§115.61[a], §115.261[a])

- Any incident of sexual abuse or sexual harassment that occurred in a facility whether the facility is or is not a part of the DOC.
- Any incident of retaliation against an employee, contractor, volunteer, inmate, or probationer/parolee who reported an incident sexual abuse or sexual harassment; and any employee neglect or violation of responsibilities that may have contributed to an incident or retaliation.
- Must document their knowledge, suspicion, and information by submitting an Internal Incident Report, when applicable, with PREA checked in the description field."

Interviews with random staff supported an understanding of this expectation. They knew that they had to forward all allegations, no matter the source or their personal beliefs as to the validity of the claim. The Auditor confirmed with staff that all allegations of past abuse in institutional settings must also be reported to the facility leadership.

Indicator b). The Department of Corrections policy OP-038.1 Reporting Important or Serious Incidents (page 5) states, "Apart from reporting to designated supervisors or officials, any information related to a sexual abuse report shall not be revealed to anyone other than to the extent necessary, as specified in operating procedures, to make treatment, investigation, and other security and management decisions." Similar language is found in two other VADOC policies. Random staff interviewed were able to voice the expectation of keeping the information confidential. They verbalized the need to involve only the key management and investigative staff necessary to obtain help and contain any evidence. Investigative staff report they will protect the individual's confidentiality and report to the appropriate state agency if the victim was targeted, as they are covered under adult protective services.

Indicator c). Medical and mental health services providers in Virginia must report incidents of sexual abuse, sexual harassment, or information that would prevent such actions. Policy OP 730.2 states, "Before beginning the Sexual Assault Assessment, the Mental Health Clinician will advise the inmate/probationer/parolee of the practitioner's duty to report and the limitations of confidentiality and that such information may be available to the facility administration in the context of an investigation in accordance with Operating Procedure 730.6, Mental Health Services: Confidentiality." The Auditor confirmed with medical and mental health staff that inmates are made aware of the limits of confidentiality. Random inmates interviewed understood the limits to confidentiality when speaking to medical or mental health staff. The inmates acknowledged they understood that if the information was related to the potential risk to them or another individual, it would be disclosed to facility investigators.

Indicator d). The facility does not serve individuals under the age of 18. Agency and Facility management and investigators were aware that abuse of individuals who are considered vulnerable adults must be reported to the State Department of Social Services. The PREA policy states, "If the alleged victim is under the age of 18, aged, incapacitated, or is an inmate or CCAP probationer/parolee receiving services from a Licensed DOC Mental Health Program, the Facility Unit Head, or Administrative Duty Officer in their absence, is required to report immediately any alleged abuse to the local Department of Social Services." Virginia law (18.2-369) defines vulnerable adults as, " "Vulnerable adult" means any person 18 years of age or older who is impaired by reason of mental illness, intellectual or developmental disability, physical illness or disability, or other causes, including age, to the extent the adult lacks sufficient understanding or capacity to make, communicate, or carry out reasonable decisions concerning his well-being or has one or more limitations that substantially impair the adult's ability to independently provide for his daily needs or safeguard his person, property, or legal interests." A further review of the state's laws (63.2-1606) confirms that all staff and contractors at a Virginia correctional system are obligated to report abuse of vulnerable adults. In addition to those with professional certification, such as health care staff, the law states, "Any person employed by or contracted with a public or private agency or facility and working with adults in an administrative, supportive or direct care capacity." The Auditor confirmed with investigators that abuse toward these targeted populations would be reported to the appropriate state agency and that there are additional charges that may be applied in cases where the victim met the definition of a vulnerable adult. The Auditor reviewed various Virginia websites that define the expectation of reporting abuse and the legal ramifications for the perpetrators of such misconduct. The Deputy Warden confirmed that no case in the last 12 months had to be reported to the Department of Social Services.

Indicator e). The Deputy Warden, PREA Compliance Manager, and facility Investigators confirmed that all allegations of sexual misconduct are reported to the facility's intelligence unit to initiate an investigation of the claim. If information

	supports a criminal act has occurred, the agency's Special Investigator Unit is then involved. PREA policy supports that all allegations are referred for investigation and also requires notification to the agency PREA Coordinator. During the audit process, the auditor looked at investigations completed at a facility level and a case that was forwarded to the SIU for potential criminal prosecution. Compliance Determination: The Virginia Department of Corrections has put in place policies that support the expectations of the standards. The language, consistent with the standard, is reiterated in several policies that further support the commitment to investigate all claims of sexual abuse, sexual harassment, and/or retaliation. The State Farm Correctional Center staff and inmates have been educated on the expectations of reporting and that all claims, no matter the source, should be investigated. Inmates and staff interviewed supported an understanding of confidentiality, its importance in the investigative process, and the limitations of confidentiality in a medical or mental health setting. The investigation files supported the idea that all claims, including third-party and anonymous claims, are forwarded for investigation. The Auditor finds the facility to be compliant with all aspects of this standard. The Auditor's interviews supported that the staff was well-trained in the expectations of the standard. The interview answers coincided with the documents reviewed, and all claims were forwarded to the investigative teams. A review of documentation supports that the State Farm Correctional Center has investigated claims no matter the source. The Auditor also found they investigated all claims, including ones that may not meet the law's definitions or those that were filed anonymously. The Auditor also found the investigative staff and facility administration understood their obligation to inform other organizations responsible for the rights of vulnerable adults.
--	---

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.3 Prison Rape Elimination Act OP 730.2 Medical Screening, Classification, and Levels of Care OP 830.6 Inmate Keep Separate Management Investigative Files reviewed

Warden's Memo

Individuals interviewed/ observations made.

Director of VA Department of Corrections Representative

Deputy Warden

Random Staff

Summary determination.

Indicator a). The Virginia Department of Corrections has at its disposal several options to ensure the safety of an inmate who is at imminent risk of sexual abuse. Policy OP 038.3 sets expectations consistent with the standard. "When a staff member, contractor, volunteer, or intern learns that an inmate or CCAP probationer/parolee is subject to a substantial risk of imminent sexual abuse, the individual must notify their supervisor or the Shift Commander so that immediate action can be taken to protect the inmate or CCAP probationer/parolee" The expectation of reporting is also covered in the healthcare policy OP730.2, "The Psychology Associate will immediately consult with the Facility Unit Head or designee and recommend housing interventions or other immediate action to protect an inmate when it is determined that the inmate is subject to a substantial risk of imminent sexual abuse, or is considered at risk for additional sexual victimization." The agency's policy OP 830.6 Inmate Keep Separate Management outlines different steps to be taken to ensure the safety of inmates, including in cases of imminent risk of sexual abuse. The process involves an immediate investigation of the situation, separation of individuals, and formal classification notations of the situation. Random staff interviewed noted the responsibility to keep an inmate safe from potential abusers until the investigative team can arrive to review the situation further. An interview with the agency Director representative also confirmed the ability to move inmates if necessary to ensure safety. The investigator confirmed that they were on call and would report to the facility immediately for allegation of imminent risk. The investigator did move a individual who made an imminent risk allegation not against a particular individual but determined there was no credible risk and the individual may have been in debt. Documentation from the investigative files supports the practice of immediate separation of parties in the facility during sexual abuse allegations. There were also no allegations of retaliation for filing or cooperating in an investigation of sexual misconduct. State Farm Corrections is a medium security open dorm environment sexually aggressive individuals who are acting out would potentially be moved back to a higher custody facility if allegations are believed.

Compliance Determination:

The Virginia Department of Corrections has in place both policy and appropriate

	resources to keep safe individuals at imminent risk of sexual abuse. As outlined in indicator a), there are several policies that direct steps to be taken to protect such individuals from sexual abuse. The DOC leadership and the Warden support the expectation that a response will be immediate upon learning that an inmate is at imminent risk. The Warden reports that, given the size of the facility, most situations of potential conflict can be resolved by moving one of the parties to another unit within the institution. They have been able to manage inmate conflicts without having to remove an individual from the general population. State Farm Correctional Center has a small Restorative Housing Unit. If an RHU use is appropriate, the Auditor is told the alleged aggressor would be sent to a higher-level facility. The Warden confirmed the ability to move either party to another institution in cases where moving parties might not resolve the risk. Movements of this nature would involve the statewide Classification Unit staff and the Warden of another prison if an intersystem move was determined to be in the inmate's best interest. Sexual aggression is a serious violation of the institutional behavioral code, which likely results in the alleged assailant being moved to a higher security facility. Though State Farm Correctional Center has not had to use this process for individuals at imminent risk, the Deputy Warden is confident in their ability to maintain an inmate's safety. The policies and Interviews completed support the ability of State Farm Correctional Center to respond to imminent risk claims of sexual abuse. The Auditor finds the standard has been met based on these factors.
--	--

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.3 Prison Rape Elimination Act OP 030.4 Special Investigations Unit Investigation files Memo from the Warden Individuals interviewed/ observations. Interview with PREA Analyst Interview with PREA Compliance Manager

Interview with the facility Investigator

Interview with Warden

Summary determination.

Indicator a). The State Farm Correctional Center administration, PREA Compliance Manager, and Investigator are aware that inmates who report abuse at prior institutions will have their complaints forwarded by the Warden to the head of the previous facility. VA DOC PREA Policy OP 038.3 (page 9) states the following:

“Any staff member, volunteer, or contractor who receives an allegation that an Inmate was sexually abused while confined at another facility must notify the Organizational Unit Head.

i. The Organizational Unit Head or designee will notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.

ii. Notification must be provided as soon as possible, but no later than 72 hours after receiving the allegation.

iii. The Organizational Unit Head or designee must document that it provided such notification.”

The Auditor confirmed through interviews with the above individuals that if current inmates claim abuse occurring in another facility (including ones outside the control of the DOC), the facility will be notified to allow an appropriate investigation to occur. The Regional PREA Analyst also confirmed that the DOC PREA/ADA unit would be notified. The Auditor was informed that there was no case of past abuse that had to be reported to another facility within the past 12 months.

Indicator b). As noted in Indicator a), the Virginia Department of Corrections policy requires notification within 72 hours after the facility becomes aware of the alleged crime. The Deputy Warden of State Farm Correctional Center was aware of the timeframe and the expectation to notify facility leadership where the crime allegedly occurred. The Memo from the Warden confirmed no such notifications were required.

Indicator c). The reported practice is that phone call notifications are followed up with email notifications and appropriate documentation to support any investigation. Documentation in the OAS-supported emails occurred. The Warden did document the receipt of an allegation from another institution.

Indicator d). In Policy OP 038.3 Prison Rape Elimination Act (page 9), the DOC sets

	forth the requirement of the initiation of an investigation if the Warden receives an allegation from another institution. "The facility head or agency office that receives the notification is responsible for ensuring that the allegation is investigated in accordance with the requirements of the Prison Rape Elimination Act National Standards." Policy OP 030.4 Office of Law Enforcement Services also provides similar language requiring an investigation of the alleged violation. The Deputy Warden of State Farm Correctional Centers is aware of this requirement. The facility received one such notification from other institutions in the prior 12 months. The PREA Analyst also receives notification from the facility when such notification happens. The Auditor was able to review the allegation with the investigator and report which documented the investigative process which occurred. Compliance Determination: The Auditor finds the facility to be compliant with the standards' expectations. The Virginia Department of Corrections has in place policy to ensure communication between facilities or agencies on sexual abuse allegations. The department requires investigations to occur no matter how long ago the allegation took place. The PREA Office of the Department of Correction also plays a role as all allegations are forwarded to them also ensuring a systematic follow up on the investigations. The Warden and the DOC Director's representative are clearly committed to ensuring each inmate victim is offered a thorough investigation. The Deputy Warden was aware of the timeliness of notifications, and the facility provided documentation to support the fact that State Farm Correctional Center immediately investigates any allegation of past abuse received. The information provided suggested that the timeframe for notifying other institutions was not met; however, corrections have been made in case a similar situation arises in the future. Interviews with the Director, Deputy Warden, PREA Coordinator, PREA Analyst, PREA Compliance Manager, and Facility Investigator, along with relevant documents, were considered. The Auditor also took into consideration that the PREA Office was notified and followed up within 24 hours.
--	---

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 030.4 Special Investigations Unit OP 038.3 Prison Rape Elimination Act

OP 075.1 Emergency Operations Plan

PREA Training Materials

Individuals interviewed/ observations.

Random Staff

Medical Staff

Summary Determinations:

Indicator a). The PREA policy OP 038.3 of the Virginia Department of Corrections sets forth the expectations for staff who are first on the scene of a reported sexual assault. The policy states, "Facility Staff Responsibilities.

1. Upon learning of an allegation that an offender was sexually assaulted or abused, the first security a staff member to respond to the report will be required to:

- a. Separate the alleged victim and abuser to ensure the victim's safety.
- b. Notify the OIC and preserve and protect the crime scene until appropriate steps can be taken to collect any evidence and.
- c. Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, showering, brushing teeth, changing clothes, urinating, defecating, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence
- d. Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, showering, 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.
- e. If the first staff responder is not a security staff member, the responder will be required to ensure the victim's safety, request that the alleged victim not take any actions that could destroy physical evidence such as showering, eating, brushing teeth, or drinking until after evidence collection, and notify the OIC."

Interviews with random staff supported the idea that they were trained in the expectations of the first responder's duties. The staff was able to provide steps they would take consistent with the policy statement above and the training materials reviewed as part of 115.131 They knew the importance of protecting evidence, supporting the victim including separating them from the alleged aggressor and ensuring medical care. The Auditor also reviewed the Emergency Operations policy OP 075.1, which uses the same language as stated above. No security staff had to respond to a sexual assault incident in the past year where sexual penetration was

	alleged. Indicator b). Interviews with non-security staff, including case management, vocational, and medical staff, confirmed they knew how to protect evidence and act as a first responder. The Virginia Department of Corrections trains all facility staff on the expectations of first responders. Non-security staff and contracted staff receive the same training that DOC staff attend annually. Training records and their ability to state the first responder's duties support an understanding of how to protect the inmate and the evidence. No non-security staff member has to respond to a sexual assault allegation. Compliance Determination: The facility did not have any custody staff available who had acted as a first responder to a case of sexual abuse in the past 12 months. Staff knew that if there were an allegation, it would result in the collection of forensic evidence and a SANE exam. The random staff interviewed support that they have an understanding of the facility's efforts to protect inmates who allege sexual abuse, protect evidence, and provide quick access to medical and mental health care. The medical staff was aware of the protocol to protect evidence on inmates until a Sexual Assault Nurse Examiner could see them. All Staff also knew the importance of thoroughly documenting incidents and maintaining confidentiality about them, except for those staff members who needed to ensure care and support the investigative process. The Auditor based the determination of compliance on the policies in place, the supporting documents for the process, and interviews with staff.
--	--

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire State Farm Correctional Center PREA Plan The VA DOC PREA Response Checklist OP 038.3 Prison Rape Elimination Act Investigative files

Individuals interviewed/ observations made.

Warden

PREA Coordinator

Medical staff

Mental Health

Investigators

PREA Analyst

Summary determination.

Indicator a). The Virginia Department of Corrections has incorporated language into the agency's PREA policy, requiring a response plan and a checklist that are consistent with the standard's expectations. "Each Facility Unit Head or designee will develop a written plan to coordinate the actions taken staff by first responders, medical practitioners, Mental Health Clinicians, investigators, and facility leadership in response to a sexual abuse incident; see Sexual Assault Response Checklist 038_F6" The PREA policy and the agency PREA response checklist provide facilities direction in the development of a plan. The Auditor reviewed the five-page plan, which discusses the roles of the first responder, shift commander, medical staff, mental health and investigators. The plan requires notification to facility administrators, PREA Compliance Manager and the Virginia DOC PREA Office. The document also states that when the Warden, the Administrative Duty Officer, and PCM are notified, as well as notification to the DOC PREA Office. The step-by-step plan provides staff with direction during the crisis and, when accompanied by the response checklist, allows for a thorough and consistent response to a sexual assault incident. The plan also included phone numbers to call and addresses of medical facilities to be used. There is also a corresponding checklist to ensure the consistent application of policy expectations. The Auditor also spoke with various staff in specialized roles who confirmed knowledge of the plan and how their respective jobs have a role in the facility's response to incidents of sexual abuse. The Auditor reminded the PREA Compliance Manager that when the new medical complex opens, the plan should be reviewed and any new staff trained. The PREA Analyst confirms he is notified when an allegation of sexual misconduct occurs.

Compliance Determination:

The Auditor has reviewed the policies and the State Farm Correctional Center PREA Response Plan to determine compliance. The plan provides direction for a consistent multi-disciplinary response to the sexual assault, which provides for the inmate victim's medical and emotional health while ensuring the effort protects evidence that could lead to a criminal conviction. The plan is available to supervisory staff, and

	interviews with the Warden's PREA Compliance Manager, as well as other staff, facilitate swift communication between all facility leadership levels and quick notification and support from the agency's PREA/ADA office. Interviews, observations, and the documents presented supported the fact that the facility is compliant with standard expectations.
--	---

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. Virginia Code §40.1 OP 135.1 Standard of Conduct Memo from PREA Coordinator Individuals interviewed/ observations. Interview with Deputy Warden Interview with PREA Coordinator Indicator a). The Auditor was provided information from the DOC PREA Coordinator, which supported the claim that there is no collective bargaining. The documentation quotes state law Virginia Code §40.1 - 57.2: "No state, county, city, town, or like governmental officer, agent, or governing body is vested with or possesses any authority to recognize any labor union or other employee association as a bargaining agent of any public officers or employees, or to collectively bargain or enter into any collective bargaining contract with any such union or association or its agents with respect to any matter relating to them or their employment or service." To further support the Department of Corrections' ability to protect the inmate victim from an alleged staff abuser, the Auditor reviewed OP 135.1 Standards of Conduct. According to this policy, the DOC outlines the authority to place an employee on administrative leave during an investigation. "A. Immediate Removal from the Workplace for Disciplinary Reviews or Administrative Investigations 1. Management may immediately remove an employee from the workplace without

	providing advance notification when the employee's continued presence a. May be harmful to the employee, other employees, and/or an inmate/probationer/parolee. b. Hinders the agency's ability to conduct business operations. c. May hamper or interfere with an internal investigation into the employee's alleged misconduct and/or may hamper an external investigation being conducted by law enforcement for alleged criminal charges and/or civil matters that are relevant to the employee's performance of assigned job duties; and/or d. May constitute negligence in regard to the agency's duties to the public and/or other employees." The Interview with the agency Director confirmed that there is no collective bargaining in DOC employment, and the agency reserves the right to place an employee, contractor, or volunteer out of a facility during an investigation of sexual misconduct. The Deputy Warden confirmed their ability to remove any individual's access from the institution, including staff, contractors, and volunteers. Indicator b). The Auditor is not required to review this provision. Compliance Determination: The Auditor has confirmed the State Farm Correctional Center does not have any collective bargaining elements that would prevent the removal of a staff person from contact with an alleged victim of sexual abuse. The Auditor has determined the facility is compliant with the standard expectations. This conclusion was based on the VA. State Code, DOC Policy, and interview with facility and agency leadership.
--	--

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – 038.3 Prison Rape Elimination Act

Policy – 075.7 Critical Incident Peer Support Team

Policy – 135.1 Standards of Conduct

Policy – 135.2 Rules Governing Employee Relationships with Offenders

Blank Retaliation Monitoring forms (staff and Offender)

Examples of monitoring.

Warden Memo

Individuals interviewed/ observations.

Deputy Warden

PREA Compliance Manager

Inmates who had filed complaints

Summary determination.

Indicator a). The Virginia DOC PREA policy OP 038.3 states, “All staff and Inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will be protected from retaliation by other Inmates or staff.” The policy language ensures a process for protecting those who report or participate in an investigation of a PREA incident. The policy goes on to identify the individual responsible for monitoring these individuals at a facility level. The policy states, “For at least 90 days following a report of sexual abuse, the PREA Compliance Manager or other designated facility staff will monitor the conduct and treatment of Inmates and staff who reported sexual abuse or cooperated with a sexual abuse investigation and of Inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by Inmates or staff, and will act promptly to remedy any such retaliation.” The Auditor confirmed with the PREA Compliance Manager and the Deputy Warden the individual's responsible for monitoring inmates and staff at State Farm Correctional Center. The PREA Compliance Manager is the individual who is responsible for monitoring inmates who report or cooperate in an investigation. The PCM is the Institutional Operations Manager and has access to disciplinary records of inmates, as well as information from Unit Managers. The Warden and Major acknowledged they would be responsible for monitoring staff who brought about a PREA allegation against a coworker. HR policy 135.1 and 135.2 speak further to monitoring staff and residents after a critical incident, including the following language: “All inmates or probationers/parolees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will be protected from retaliation by other inmates, probationers/parolees, or staff. (§115.67[a, c], §115.267[a, c])

1. The Organizational Unit Head will designate appropriate staff to monitor the conduct and treatment of inmates, probationers/parolees, or staff who reported or cooperated with an investigation into sexual abuse or sexual harassment.
 - a. Designated staff will monitor for retaliation at least 90 days following the report to determine if there are changes that may suggest possible retaliation by inmates and probationers/parolees or staff.
 - b. If the initial monitoring indicates a continuing need, designated staff will continue monitoring beyond 90 days and notify the unit PREA Compliance Manager.

Indicator b). OP 038.3 outlines the steps that should be taken to ensure the safety of victims or individuals who cooperate in the investigation. "Multiple measures are available to protect staff and Inmates from retaliation; such measures include 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 and staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations." An interview with agency and facility leadership confirms the agency's commitment to ensuring the safety of inmates who file a PREA complaint. The Auditor confirmed with individuals that unit management allows for routine direct communication and observation of a detainee victim or individuals who cooperated in the investigation. The facility has the PREA Compliance Manager as the monitor of retaliation for all inmates. The PCM will work with unit management to obtain updates on the victim or others who cooperated in the investigation of sexual abuse.

Indicator c). Consistent with the standard expectation, the DOC policy requires monitoring to be for at least 90 days. The PREA policy states, "For at least 90 days following a report of sexual abuse, the PREA Compliance Manager or other designated facility staff will monitor the conduct and treatment of Inmates and staff who reported sexual abuse or cooperated with a sexual abuse investigation, and of Inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by Inmates or staff, and will act promptly to remedy any such retaliation. a. Items to be monitored include any Inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. b. The PREA Compliance Manager must continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. 2. In the case of offenders, such monitoring will also include periodic status checks." The Auditor confirmed the requirements of this indicator with the PREA Compliance Manager. There were no substantiated cases of sexual abuse at the State Farm Correctional Center in the past year that were tracked. The facility Investigators also monitor inmates for retaliation during the investigative process. . These investigations were reviewed during the site visit as the outcomes included findings that were unsubstantiated, unfounded, or determined not to meet the PREA definition of abuse or harassment. A sample retaliation monitoring form was provided. The facility also has similar forms for

monitoring staff. The Warden confirmed that Senior Leadership staff would be responsible for the continued monitoring of staff who reported or cooperated in an investigation of sexual abuse.

.

Indicator d). As noted in indicator c), the monitoring will include periodic status checks. Interviews with the PREA Compliance Manager confirmed that she would monitor residents including check-ins conversations with inmates. The PCM also reported that she would consider disciplinary actions and bed changes, as well as make visual observations of the inmate's interactions with peers and staff. She can do this directly in the unit and will seek input from unit managers, line staff, and treatment staff.

Indicator e). As noted in Indicator (b), the protection measures would include steps taken to protect staff cooperating in an investigation related to PREA. The Agency's policy OP 075.7, Critical Incident Peer Support Team, defines additional staff support available to staff. The Policy states, "Employees who fear retaliation for reporting or cooperating with investigations into sexual abuse or sexual harassment and are in need of or request emotional support services should be referred to the Employee Assistance Program (EAP)." No staff member was required to be monitored for retaliation for making a PREA Allegation against another staff member or cooperating in an investigation of that nature. The Warden, Deputy Warden and the Major would be responsible for monitoring the facility staff. As noted above, the facility and agency have measures in place to monitor staff cooperation during an investigation.

Indicator f). The Auditor is not required to consider this indicator

Compliance Determination:

The Auditor was provided with a policy that matches the standard expectations. The documentation provided showed that the process described in the policy could be operationalized in the event of a sexual abuse case. Interviews with the representative of the Director of the Department of Corrections and the Warden support the expectation of protecting individuals from retaliation. The Auditor reviewed tracking forms to be used when incidents of sexual abuse have been either substantiated or unsubstantiated. The Auditor also took into consideration that most inmates spoken with confirmed they have routine access to the management staff. The PREA Compliance Manager and the facility Investigator were both aware of the expectations in monitoring for retaliation. Compliance is based on policies, supporting documentation, interviews with agency and facility administration, and with inmates. The culmination of these factors supports compliance with the standards and expectations.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard Auditor Discussion Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 425.4 Management of Bed and Cell Assignment OP 830.5 Transfers and facility reassignments Sexual Abuse/Sexual Harassment Available Alternatives Assessment Form Memo from the Warden Individuals interviewed/ observations made. Deputy Warden PREA Coordinator Summary determination. Indicator a). The Virginia Department of Corrections policy addresses the need to protect victims after making an allegation of sexual misconduct. Policy OP 830.5 Transfers, Facility Reassignments, requires that inmates alleged to have suffered sexual abuse should not normally be placed in segregation or specialized housing without their consent unless it has been determined that there are no available alternative means of separation from likely abusers. "Offenders identified as HRSV or offenders alleged to have suffered sexual abuse should not normally be placed in a Restorative Housing Unit without their consent unless it has been determined by a Psychology Associate, in consultation with the Shift Commander and Regional PREA Analyst, that there are no available alternative means of separation from likely abusers." Additionally, the policy requires the facility classification team to complete an assessment of alternative housing options before placing the individual in involuntary segregation. The policy further states that the assignment to segregation/ restrictive housing shall not ordinarily exceed 30 days. In interviews with the Deputy Warden, they reported it is not the practice of the facility to place victims of sexual abuse in protective custody against their will. The facility offers options for relocating inmates who have internal conflicts or those with issues related to the DOC, including classification options such as transfer, which will be assessed. The DOC policy allows for placement if there is no other option;

	however, State Farm Correctional Center does not have a special management unit and does not utilize segregated housing to promote safety within the facility. If the facility were to consider this, it would be required to document its efforts in a form called the Sexual Abuse/Sexual Harassment Available Alternative Assessment. A review of policy OP 425.4 Management of Bed and Cell Assignment indicated that all Inmates identified as alleged victims of sexual abuse (HRSV) should be checked to determine the need for continued separation from the general population. The policy states, "Inmates identified as HRSV or Inmates alleged to have suffered sexual abuse or sexual harassment will not be placed in the restrictive housing unit without their consent unless an assessment of all available alternatives has been made, and it has been determined by the QMHP in consultation with the Shift Commander and Regional PREA Analyst that there are no available alternative means of separation from likely abusers." The Virginia DOC has also developed a required form to document the various alternatives considered before involuntarily placing a person in the Restrictive Housing Unit. The PCM, and Deputy Warden, confirmed there were no cases where protective custody was used to ensure the safety of a sexual abuse victim or an individual who believed they were at imminent risk of being abused. Compliance Determination: The State Farm Correctional Center has not utilized segregated housing units to protect inmates from sexual abuse. The Auditor confirmed this has not occurred in the past year with the Deputy Warden. The DOC has a policy in place that is consistent with the standard requirements, showing at both the facility and state levels that segregation is the last solution. The agency's PREA Coordinator is kept aware of any individual placed in involuntary segregation for the risk of sexual victimization. The Policy requires notification by facility staff to the regional PREA Analyst. The agency also has forms in place to ensure that all required steps are taken to keep the inmate safe while avoiding limiting their access to services. Based on a review of the agency's policy, observations, and information obtained through staff and facility leadership interviews and documentation reviews, the Auditor has determined that the facility complies with standard expectations.
--	--

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire

Policy OP 038.3 Prison Rape Elimination Act

Policy OP 030.4 Special Investigations Unit

Sexual Assault Response Plan

Investigative matrix

OLES and Facility Investigator Training

Individuals interviewed/ observations made.

PREA Coordinator

Regional PREA Analyst

PREA Compliance Manager

Deputy Warden

Investigative Staff

Summary Determination

Indicator (a) The Virginia Department of Corrections has trained law enforcement staff, and as such, the agency is responsible for both criminal and administrative investigations. In policies OP 038.3 and 030.4, the agency outlined the responsibilities of the investigative team, including the need for a prompt and thorough investigation of the facts, as well as a complete report that outlines the processes undertaken and the reasoning behind the findings. The policy states, "All investigations into allegations of sexual abuse and sexual harassment shall be done promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports." The facility investigator will make an initial assessment of the situation. "Unless the facility investigator quickly and definitively determines that the allegation is unfounded, allegations of sexual abuse or sexual harassment shall be referred for investigation to the DOC Special Investigations Unit, which has the legal authority to conduct criminal investigations." Random staff members interviewed supported the idea that they must report all claims, regardless of the source or whether they believe the incident occurred. Interviews with the facility investigator confirmed that all allegations were reviewed. Investigative files support administrative investigations that have occurred in the past year. The Investigation unit is housed just outside the perimeter of the facility with full camera access. The Auditor was able to see their access to cameras and audio surveillance. The Supervisor confirms they are on call and can respond if the allegation of sexual abuse occurs when no trained investigator is on site.

.

Indicator (b) From the record provided in 115.34, the Virginia DOC reports that they employ 19 approved criminal investigators. State Farm Correctional Center has a Facility Investigator and an Intelligence Unit staff trained who would be required to respond to sexual assault complaints to protect and collect evidence, and who would complete administrative investigations. The Investigator confirmed that they responded immediately to allegations of sexual misconduct. The Auditor reviewed files with the facility investigator, who described how the facility notifies him when an allegation occurs. The officer described the initial directions they requested to be taken if they were responding from outside the facility. The facility investigator supports the fact that the process is objective, and they do not enter with any preconceived notion based on an individual's position as a staff member or inmate in determining the outcome. Instead, they base their findings on factual information and the statements of the individuals involved and the witnesses. The auditor reviewed eight administrative and potential criminal case files to gain an understanding of the process, which was consistent with the agency's policy expectations. In addition to interviews and reviews of written reports, the investigator described how they reviewed video, inmate call records, and historical information from current and past institutional stays. The investigator was able to relate information provided in their training and how it has been applied during the investigative process. Intel investigators take the NIC training for investigating Sexual Abuse in a Correctional Center. The PREA Office of the DOC provided investigation training, including the intel staff of SFCC.

An OLES investigator interviewed earlier this year also supported an understanding of the process consistent with the Department's expected investigative process. The OLES Agent described the additional training they undergo as law enforcement officers in Virginia. The State Farm Correctional Center had one case completed by OLES. The nature of the alleged abuse, lack of cooperation by the victim and the length of time did not result in a forensic exam or collection of DNA evidence. The OLES referred the case for prosecution who declined to file for prosecution. The Office of Law Enforcement Services has assigned investigators to respond to criminal activity, including sexual abuse allegations at each DOC facility in the region. State Farm Investigative team will ensure evidence is preserved including audio recordings.

Indicator (c) Investigative staff interviewed, inmates who were part of an investigation confirmed, and investigative files reviewed supported the requirements of this indicator. Intelligence Unit members for SFCC know how to collect evidence from a crime scene to ensure the preservation of evidence, including DNA. They will work with the assigned OLES Agent in criminal cases. The Virginia DOC trains all line staff to preserve evidence, including the securing of potential crime scenes and encouraging victims not to do anything that would potentially degrade the quality of the DNA evidence. As noted in Section 115.21, forensic exams of the victim would not occur at SFCC, but rather at a local hospital with SANE-trained nurses. The investigation file also confirms that interviews with the victim, the alleged perpetrator, and the witness are conducted routinely as part of the investigation. The investigation policy (030.4 page 11) states, "Investigators shall gather and preserve

direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.” Reviews of the two investigative files support the idea that video and audio recordings are reviewed, as well as interviews with the victim, the alleged perpetrator, and witnesses. The Investigators spoke with support that they consider past behaviors/allegations as part of their credibility assessments. File reviews completed by the auditor supported the fact that the investigators consistently followed stated practice, including interviewing primary individuals identified in the case as well as both staff and inmate witnesses. Written statements and video reviews were also documented in the case files. All records are kept electronically and are siloed, preventing others from accessing the information. In addition to interviews with all parties present, they will also ask for written statements. The Auditor was able to see these and the summary notes from the interviews.

Indicator (d) The investigator supports OLES's ability to complete compelled interviews in criminal cases, and that they would work closely with the local prosecutor on the case. Policy 030.4 describes the expected interactions with the prosecutorial authorities (page 11). “When the quality of evidence appears to support a criminal prosecution, the agency will conduct compelled interviews only after consulting with the Commonwealth’s Attorneys as to whether compelled interviews may be an obstacle for subsequent criminal prosecution..” None of the past years' investigations required the use of compelled interviews. The OLES Agent interviewed confirmed that they will have regular contact with the local prosecutor before having a compelled interview.

Indicator (e) The investigator interviewed confirmed that there is no requirement for a victim to undergo any polygraph or other truth-telling process to proceed with an investigation. The Investigator confirmed in the discussions with the Auditor what the policy requires (030.4). “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/probationer/parole or staff. No agency will require an inmate/probationer/parole who alleges sexual abuse to submit to a polygraph examination or other truth-telling devices as a condition for proceeding with the investigation of such an allegation.” Investigators discussed examining the consistency of statements and comparing them with video evidence before considering past allegations/incidents. The investigator does not use an individual's status as staff or inmate to determine the validity of statements.

Indicator (f) All criminal investigations potentially can include a referral for an administrative review if the evidence supports that a staff person's actions or inactions led to an inmate-on-inmate sexual assault. Administrative investigations

into sexual harassment claims or other staff actions related to sexual misconduct can result in discipline that may include, but is not limited to, termination. All completed administrative investigations must have a related investigation file, which includes written or oral statements, video or other physical evidence, and the reasoning behind the conclusions reached. The facility's Investigator completes an initial assessment to determine if there were potential criminal acts that they can identify, as well as administrative concerns that would warrant further investigation. The investigator would review the staff's actions or inaction that led to the reported abuse. Policy 030.4 outlines the requirement for an administrative investigation to assess staff actions. "Must include an effort to determine whether staff actions or failures to act contributed to the abuse."

Indicator (g). All criminal investigations that the OLES Agent completes result in a written report, as required by the agency's related policies. The Administrative investigative files reviewed by the Auditor included documentation of interviews, physical evidence, and videos or other documents reviewed as part of the investigatory process. All files also include an investigation checklist to facilitate the tracking of information obtained. Agency policy defines expected reporting requirements for administrative investigations. "K. Administrative investigations (§115.71[f], §115.271[f])

1. Must include an effort to determine whether staff actions or failures to act contributed to the abuse.

2. Will be documented in written reports that include a description of the physical and testimonial

evidence, the reasoning behind credibility assessments, and investigative facts and findings."

Indicator (h) Agency policy requires all criminal acts to be referred for criminal prosecution. Policy 030.4 Office of Law Enforcement Services (page 11) states, "When the quality of evidence appears to support a criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. " The Policy goes on to state, "Criminal investigations will be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Substantiated allegations of conduct that appear to be criminal will be referred for prosecution." This expectation was confirmed in the interviews with investigative staff.

Indicator (i) The Virginia Department of Corrections' record retention requires a

greater retention period than 5 years beyond the separation of the parties from the institution. This was confirmed through the investigator's interview. Policy O38.3 defines the requirements consistent with the standard: "All sexual abuse data collected must be maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise."

Indicator (j) Agency policy and the Investigators interviewed confirmed that individuals' departure from the institution would not result in the case being closed. The investigation policy states, "The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation." The OLES Agents are trained law enforcement officers, as defined by the state of Virginia, with full police authority to conduct investigations outside the institution to continue pursuing information related to the case.

Indicator (k): The Auditor is not required to audit this provision.

Indicator (l) This indicator does not apply as noted above; the Virginia DOC has full authority to complete criminal investigations in its facilities.

Compliance Determination.

The Virginia Department of Corrections requires all incidents to be investigated promptly upon notification to staff. The agency's PREA policy and Investigative policy require prompt investigations of sexual abuse and sexual harassment in VA DOC facilities. In determining compliance, the Auditor took into consideration many factors. The State Farm Correctional Center and the VA DOC have sufficient and appropriately trained individuals who can complete sexual assault investigations. Virginia DOC investigates all potential sexually related incidents as possible PREA events, even if the inmates report the actions were consensual. Investigative files reviewed include cases initiated through staff reports, inmate reports, and third-party reports of potential sexual misconduct. In doing so, they ensure that all incidents are investigated and evidence is collected, which provides an opportunity for a reluctant victim to come forward later.

In the Auditor's interview, the investigative staff was able to identify the steps taken to gather evidence, how the credibility of the various persons involved is determined on an individual basis, and that polygraph exams would not be required for the initiation of an investigation. Consistent with policy, it was stated that investigative reports would be completed on all administrative and criminal investigations.

The Auditor reviewed eight investigative files from allegations of sexual abuse and harassment at SFCC in 2025-26 as part of the audit process. The Auditor found consistent reports, physical evidence, testimonials, and documentation to support the

	outcome. In determining compliance, the Auditor considered the stated information found in policies, actual investigative files, and interviews with investigative staff and inmates who had been involved in the investigations.
--	---

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy OP 135.2 Rules of Conduct Warden Memo Individuals interviewed/ observations made. Interview with the facility Investigator Summary determination. Indicator (a) Virginia DOC Policy OP 135.2 Rules of Conduct states, “A preponderance of the evidence will be adequate in determining whether allegations of sexual abuse or sexual harassment are substantiated.” The facility investigator confirmed this standard. In reviewing the past year’s case files, the facility's Investigator discussed how the investigators arrived at their conclusions in the cases reviewed. The facility investigator will handle most administrative investigations, unless the allegation involves a staff member, in which case the Office of Law Enforcement Services (OLES) will conduct the investigation. Interviews with the facility investigator also confirmed that there is no higher standard in determining the outcome than in determining the preponderance of the evidence. He described the process of determining whether there was a greater likelihood that the allegation occurred than it did not, in order to substantiate a case. The agency report format provides a comprehensive review of facts used in making a determination. The report includes evidence considered, credibility assessments, evidence collected, interviews, and video or other electronic data. Compliance Determination The Department of Corrections has staff trained in the investigation of Sexual Assaults at the state correctional facilities, as noted in 115.34. The facility

	investigator reviewed PREA case files with the Auditor and described the process for a criminal case and the process for an administrative investigation. The Investigator was able to explain how they determine the outcome of administrative cases based on the preponderance of the evidence. Compliance was based on the policy, the review of investigation files, and the interview with investigative staff.
--	--

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 030.4 Special Investigations Unit OP 038.3 Prison Rape Elimination Act Warden Memos Investigation files Individuals interviewed/ observations. Interview with the Facility Investigator Interview with the PREA Compliance Manager Summary determination. Indicator (a) Virginia DOC provides notification to all inmates on the outcome of their investigations into sexual misconduct. The agency policy OP 030.4 Office of Law Enforcement Services requires, "Upon completion of the investigation, the inmate and CCAP probationer/parolee will be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. OLES should report to the Facility Unit Head to inform the inmate or CCAP probationer/parolee as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded." The interview with the Investigator supports that they come to one of these three conclusions in all sexual abuse or sexual harassment cases. At State Farm Correctional Center, the outcome of all investigations is reported to the inmate by the investigators. Three alleged acts were investigated in the past year for potential sexual abuse. The two cases were reviewed by the facility Investigative team and one by OLES. One of the facility investigative cases was determined to be not actually a

PREA incident by definition. In this case the inmate was notified of the outcome and signed the form. In the other two cases the inmate was no longer at SFCC. In the allegation lodged by an inmate at another facility the notification was sent to that facility. In the letter the inmate was told the outcome was unsubstantiated and that he would not have further contact with that staff. In the third case, investigated by OLES, the person denied being a victim or cooperating in the investigation even though the other individual confessed to their conduct. In that case the inmate did not report abuse. The information which initiated the investigation came from phone surveillance of an unrelated incident.

Indicator (b) This indicator does not apply as Virginia DOC completes criminal and administrative investigations at all DOC facilities. The Virginia Department of Corrections employs an Office of Law Enforcement Services that can complete criminal investigations while the Intel officer conducts initial reviews and administrative investigations. The OLES investigated one of the three cases which was substantiated and referred for prosecution but not accepted at this time.

Indicator (c) The policy OP 038.3 Prison Rape Elimination Act uses language consistent with this standard indicator to define the information that must be notified to the inmate victim. The policy states, "Following an offender's allegation that a staff member committed sexual abuse against the offender, the PREA Compliance Manager or investigator must subsequently inform the offender whenever:

- i. The allegation has been determined to be unfounded
- ii. The allegation has been determined to be unsubstantiated
- iii. The staff member is no longer posted within the offender's unit
- iv. The staff member is no longer employed at the facility
- v. The DOC learns that the staff member has been indicted on a charge related to sexual abuse within the facility
- vi. The DOC learns that the staff member has been convicted of a charge related to sexual abuse within the facility." The Auditor reviewed cases from the past 12 months of potential notifications made to inmates at State Farm Correctional Center. There were three sexual abuse cases, and five potential sexual harassment allegations. The agency provides notifications on both sexual abuse cases and sexual harassment allegations. The Auditor was able to see sexual harassment allegation notification during the onsite file review.

Indicator (d) The policy language in OP 038.3 covers the required notification for an inmate-on-inmate sexual abuse cases. "Following an offender's allegation that they

	have been sexually abused by another offender, the PREA Compliance Manager or investigator must subsequently inform the alleged victim whenever: i. The allegation has been determined to be unfounded ii. The allegation has been determined to be unsubstantiated iii. The DOC learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility iv. The DOC learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility The Auditor was provided with examples of investigations, but only one was at the facility after the investigation and was provided notice. The Inmates interviewed who were at the facility with sexual harassment complaints confirmed they had no contact during the investigation. Indicator e). The State Farm Correctional Center would provide each inmate with a written letter on the outcome of their investigation. Investigators and the PREA Compliance Manager were aware of the standard's expectation. PREA policy 083.3 states, "The PREA Compliance Manager or Investigator must document all such notifications and attempted notifications and will send the notifications to the inmate or CCAP probationer/parolee in the same manner as legal correspondence; see Operating Procedure 803.1, Inmate and Probationer/Parolee Correspondence for legal mail requirements." Compliance Determination: The Auditor reviewed the policy, documents in investigation files and interviewed the investigator and the PREA Compliance Manager regarding notifications. The Auditor reviewed investigation files to determine if a notification was required. The auditor found the facility in compliance with the standard based on the policy, documentation, and interviews with the investigator and the PREA Compliance Manager.
--	--

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire

OP 038.3 Prison Rape Elimination Act

OP 135.1 Standards of Conduct

OP 135.2 Rules of Conduct Governing Employee Relationships with Offenders

Warden Memos

Individuals interviewed/ observations made.

Interview with Human Resources

Interview with Warden

Interview with Facility Investigator

Interview with OLES Investigator

Summary determination.

Indicator a). The Virginia Department of Corrections has policies that govern staff conduct and sanctions for violations. OP 135.2 Rules of Conduct Governing Employee Relationships with Offenders (page 6) states: "Sexual misconduct will be treated as a Group III offense subject to disciplinary sanctions up to and including termination under Operating Procedure 135.1, Standards of Conduct. Termination will be the presumptive disciplinary sanction for staff who engage in sexual abuse." As the Auditor has learned, Group III violations are considered the most serious offenses. Page 19 of the policy describes group three conduct as "These offenses include acts and behavior of such a serious nature that a first occurrence normally should warrant termination." Number 24 on the list of Group III violations is Sexual Misconduct with Inmates/probationers/parolees. The Agency Director confirmed that staff can be terminated for such actions. Memos were provided confirming that there had been no staff disciplined in the past year, referred for prosecution, or notified to any licensing body for sexual misconduct cases.

Indicator b). The Department of Corrections policy OP 135.2 goes on to state, "Termination will be the presumptive disciplinary sanction for employees who have engaged in sexual abuse." As noted in indicator a), the Auditor confirmed with the Human Resources staff that employees engaging in the sexual abuse of inmates will be terminated. There were no incidents of staff being terminated in the last 12 months at State Farm Correctional Center for sexual abuse of an inmate. The policy also states that staff who engage in sexual acts with inmates will be charged with a felony in addition to termination. One employee whose cases was investigated by OLES resigned during the investigation but would otherwise been referred for formal disciplinary action.

	Indicator c). The Department of Corrections policy OP 135.2 states, “Disciplinary sanctions for violations of DOC policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) will be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories” The Warden reports there have been no incidents of staff who have been disciplined for sexual harassment of inmates. One employee was referred for investigation of conduct separate from the inmate's allegation, but the separate policy violation was discovered during the administrative investigation. Indicator d). Policy language addresses the standard indicator when it states, “All terminations for violations of DOC sexual abuse or sexual harassment policies, or resignations by staff that would have been terminated if not for their resignation, must be reported to any relevant licensing bodies by the DOC PREA Coordinator, and to law enforcement agencies unless the activity was clearly not criminal.” As noted in 115.71, the State Farm Correctional Center has access to a criminal investigator who is considered a law enforcement officer in the state of Virginia, with full powers of arrest. The OLES criminal investigators have the authority to pursue an investigation outside the institution if an inmate has been released or if a staff member resigns before being terminated. The facility administration confirmed that staff or contractors who have licenses will have the misconduct reported to the governing body responsible for their licenses. Compliance Determination: The Virginia Department of Corrections has in place the appropriate resources to thoroughly investigate staff sexual misconduct and apply discipline when deemed warranted. The agency has in place the ability to terminate staff for first offenses of sexual abuse of inmates. Policies are in place, and interviews conducted support compliance. Since the facility had not disciplined a staff member, there was no file to review.
--	--

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 027.1 Volunteer and Internship Program

OP 135.2 Rules of Conduct Governing Employee Relationships with Offenders

Memos from the Warden

Contractor and Volunteer Orientation

Individuals interviewed/ observations.

Interview with Investigator

Interview with PREA Compliance Manager

Interview with Warden

Interviews with Contractors/Volunteers

Summary determination.

Indicator a). The Virginia Department of Corrections has trained contractors and volunteers on the consequences of engaging in sexual abuse or sexual harassment of an inmate. Interviews with contractors and volunteers reveal that they were aware of the standard of conduct, including the fact that individuals engaging in such misconduct can be immediately barred from access to the institution and may be referred for criminal prosecution based on the type of misconduct. Agency policies OP 027.1 and OP 135.2 state, "Any contractor or volunteer who engages in sexual abuse of Inmates must be prohibited from contact with Inmates and must be reported to any relevant licensing bodies by the DOC PREA Coordinator and law enforcement agencies unless the activity was clearly not criminal. The DOC will take appropriate remedial measures and will consider whether to prohibit further contact with offenders in the case of any other violation of DOC sexual abuse or sexual harassment policies by a contractor or volunteer." The Investigator confirmed, as noted in 115.71, that the governing body would be notified if the contractor or volunteer is a licensed professional. In the past 12 months, no contractors or volunteers were reported to law enforcement for engaging in the sexual abuse of inmates. Memos from the Warden support that there have been no sexual abuse cases involving contractors or volunteers. Interviews with contractors and volunteers support their understanding from the training that all sexual misconduct will be investigated and could lead to criminal charges.

Indicator b). As noted in indicator a), non-criminal violations of the agency's standard of conduct must be reviewed by facility management before an individual can regain access to the facility. Policy on volunteers and interns OP 027.1 (page 12) stated, "In the event of any other violation of agency sexual abuse or sexual harassment policies by a volunteer, the facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with offenders." There have been no

	allegations against any contractor or volunteer in the past 12 months that would require the warden to order a person's access to be halted. The Warden would review the investigation to determine if any identified policy violations required the individual to be denied access to inmates. Compliance Determination: The Virginia Department of Corrections has sufficient policies to ensure that if a victim or contractor engages in sexual misconduct, the case will be investigated, the inmate will be protected by halting the alleged perpetrator's access to the facility, and notifications to the appropriate licensing bodies. Policy language also informs individuals about criminal charges that may result from sexual misconduct. The facility staff is aware of the importance of removing alleged abusers from access to the victim. Supporting the information provided, the Auditor took into consideration the training and interviews with contractors and volunteers who were aware of the consequences of engaging in sexual harassment or sexual abuse of inmates. The individuals the Auditor spoke with understood that individuals could be banned from access and risk prosecution based on the type of misconduct engaged in. Compliance absent a disciplinary case is based on policy and interviews.
--	---

115.78 Disciplinary sanctions for inmates	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire OP 038.3 Prison Rape Elimination Act OP 820.2 Reentry Planning OP 830.3 Good Time Awards OP 861.1 Inmate Discipline, Institutions, and Operating Procedures Individuals interviewed/ observations made. Interview with the Regional PREA Analyst Interview with the Warden

Interview with the PREA Compliance Manager

Summary determination.

Indicator a). Virginia Department of Corrections policy OP 038.3 Prison Rape Elimination Act states, "Sexual harassment, assault, and abuse by incarcerated Inmates is prohibited and subject to disciplinary action per Operating Procedure 861.1, Inmate Discipline, Institutions, and Operating Procedure 940.4, Community Corrections Alternative Program, and may result in criminal charges." A review of policy OP 861.1 finds that Sexual Assault is defined as a Class 1 offense, as is making false statements against staff and making or performing lewd or obscene acts. The policy describes the various steps in the disciplinary process and the potential consequences that can be assigned. The Sexual Assault definition in the policy also has a statement requiring the referral to the counselor for a reassessment of the individual's risk level as it relates to the PREA screening. There were no sexual abuse cases at BCC.

Indicator b). Sanctions for an inmate in the institution must be similar to those of other inmates with similar histories. Policy OP 861.1 Inmate Discipline, Institutions, and Operating Procedures states, "In determining the appropriate penalty, consideration shall be given to the nature and circumstances of the offense committed, the offender's disciplinary history, and the penalty imposed for comparable offenses committed by other Inmates with similar histories." Discussions with facility leadership confirmed that violent Inmates may be required to return to a higher level of custody. Level two offenses, which include engaging in sexual acts by consent, could result in consequences in the facility. The policy structure allows for a range of sanctions that the discipline committee can consider, ensuring that the consequences are similar to those imposed on other individuals who have committed similar acts in the facility.

Indicator c). Policy OP 861.1 defines steps required to be taken if the inmate who is the potential subject of discipline has a mental disability or illness. The policy outlines the committee's steps prior to holding a disciplinary hearing. Action includes having the inmate's case reviewed by a Qualified Mental Health Professional (QMHP) who can provide a clinical impression of the inmate, the ability to understand their actions or the hearing process, and how actions such as specialized housing may impact their institutional stay. There have been no reported cases of inmate discipline at State Farm Correctional Center in the past year. Memos were provided by the Warden confirming no discipline cases have occurred in the past year for sexual abuse or for information determined to be in bad faith.

Indicator d). Inmates at State Farm Correctional Center can receive individualized counseling on the underlying causes of their sexual misconduct. The facility does not have a specific program for sexual offenders, and those services reportedly are more available in other DOC facilities. Indicator (b) notes that an inmate who engages in sexual abuse would likely be moved to a higher-level facility. Mental Health staff confirmed that they can complete an assessment of this standard concern. The discipline policy goes on to require consultation with mental health prior to having a hearing.

“1. Prior to scheduling a time for the accused to meet with an advisor, the Hearings Officer will verify a

Mental Health Clinician has been contacted to meet with an accused inmate if the inmate is:

Assigned to a Mental Health Unit.

Housed in Restorative Housing for a mental health reason, e.g., suicide watch.

Assigned to a Mental Health Code of MH-2S or higher.

Who may be cognitively or mentally impaired in the general population.

2. If the accused inmate qualifies but has not met with a Mental Health Clinician, the Hearings Officer

should contact a Mental Health Clinician to meet with the accused as soon as practicable.

3. Once the Hearings Officer verifies contact with a Mental Health Clinician, the Hearings Officer will

ensure a completed Disciplinary Offense Mental Health Screening 861_F2 is attached to the

Disciplinary Offense Report. (115.78[c])”

Indicator e) Agency policy does not allow for the discipline of inmates who engage in sexual contact with a staff member unless it is proven that the staff did not consent. Policy OP 861.1 under the definitions of disciplinary actions is the following. “Making sexual advances, either physical, verbal in nature, or in writing, toward a nonoffender without their consent.”

Indicator f) OP 038.3 defines when an inmate can and cannot be disciplined for filing a PREA complaint in bad faith. The policy states, “Any Inmate who makes a report of offender-on-inmate sexual violence or staff sexual misconduct or harassment that is determined to be false may be charged with a disciplinary offense if it is determined

	in consultation with the Regional PREA Analyst that the report was made in bad faith. Inmates will not be charged for reports of sexual abuse made in good faith, based upon a reasonable belief that the alleged conduct occurred. Even if an investigation does not establish sufficient evidence to substantiate the allegation, reports of sexual abuse made in good faith will not constitute falsely reporting an incident or lying.” There have been no cases in the last year. Agency policy (OP 861.1) describes the process to ensure only those reports purposefully filed in bad faith are disciplined. “Due to the sensitive nature of this offense, it is important that it is handled with utmost caution and fairness to avoid hindering the offender's right to file complaints against employees. This offense aims to prevent Inmates from fabricating charges against corrections employees. Before this offense can be brought, an impartial third party must investigate whether there are any facts that could substantiate the statement or charge. The investigation should include, but is not limited to, interviewing the Inmate who made the allegation and the employee who is the subject of the allegation.” Indicator g) State Farm Correctional Center does not allow consensual sexual contact between inmates. Inmates whom the Auditor spoke to understand that such behavior may result in disciplinary actions. PREA policy OP 038.3 states, “Consensual sexual activity among Inmates is prohibited. Inmates who engage in this type of activity will be subject to disciplinary action in accordance with Operating Procedure 861.1 Inmate Discipline”. Compliance Determination: The Virginia Department of Corrections and the State Farm Correctional Center have in place systems for holding individuals accountable for sexual misconduct. The policies require the disciplinary committee to consider factors on the inmate’s mental health and cognitive capacities. The facility has had no incidents in the last year that resulted in a formal discipline for the Auditor to review. The agency staff's interviews and policy language support the use of discipline for false reporting of PREA incidents, which would be done in a cautious manner to avoid impacting the overall population's willingness to report incidents. All disciplines related to sexual misconduct are required to be referred to the Regional PREA Analyst for review and consultation before a final consequence is rendered. Compliance determination was based on interviews, policies, and supporting documents reviewed.
--	--

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

Policies and written/electronic documentation reviewed.

State Farm Correctional Center Pre-Audit Questionnaire

OP 038.3 Prison Rape Elimination Act

OP 730.2 MHS Screening, Assessment, and Classification

OP 730.6 MHWS Confidentiality

OP 735.2 Sex Offender Treatment Services

Policy Health Services Unit

Facility Information Booklet

Classification Records

Medical and Mental Health Records

Memos from the Warden

Individuals interviewed/ observations.

Interviews with Medical Professionals

Interview with Mental Health Professional

Interviews with Random Inmates

Indicator Summary Determination

Indicator (a) Inmates who are identified through the screening process or who admit a history of sexual trauma can be referred to either Mental Health Services or the local rape crisis agency. The Auditor confirmed this practice through the review of documented cases in Inmate files and interviews with inmates and Mental health and case management staff. DOC policy OP 730.2 MHS Screening, Assessment, and Classification sets forth the requirement to refer all individuals who are admitted with past histories of sexual assault or sexual victimization to mental health services, who will follow up within 14 days. The policy states, "In institutions, within 14 days of completion of the Classification Assessment, the QMHP will notify those offenders, identified as HRSA or HRSV, of the availability for a follow-up meeting with a mental health practitioner and inform the Inmate of available relevant treatment and programming. Notification will be documented on the Prison Rape Elimination Act (PREA) QMHP Follow-Up form. The cases reviewed supported follow-up occurring within the required timeframes. The Virginia DOC has forms that must be completed

to document the inmate's visit and the services offered. The one inmate confirmed they were offered mental health immediately upon the disclosure. Inmates who were interviewed support that they have the ability to address their issues through the mental health services of their past abuse. The inmates' understanding of the services of the local rape crisis agency or the use of the 800 number as a support service varied. Inmates interviewed with past histories were aware of the 24-hour option to call for support, and most agreed that professional visits could occur at the facility. Inmates support that access to mental health or medical services was not difficult. The residents confirm that the Mental Health staff regularly walk through the units to check in with individuals. Inmates report that accessing individual services is not hard at SFCC.. The Auditor did not find evidence in file reviews that supported residents with past histories were not being offered mental health services for past trauma.

Indicator (b) Inmates who engage in sexual assault or have a history of sexual offenses are automatically referred to Mental Health for an assessment. State Farm Correctional Center has mental health professionals who can provide individual services to individuals with sexual offense histories. Most inmates would have been transferred in from a receiving institution or a higher-level facility where treatment may have been offered for past behaviors. Inmates with sexual offense backgrounds would have likely been identified and possibly undergone treatment previously. The DOC tool, as discussed in standard 115.41, identifies perpetrating behaviors. The Department has a dedicated treatment program for individuals with sexual offense histories, and residents can continue therapy at SFCC. As noted previously, an Inmate who commits a sexual offense at BCC would likely be moved to a higher level of custody. The Mental Health staff confirmed that they can provide ongoing counseling for those individuals who have past histories of sexual offending behaviors. The facility reported that a considerable portion of the facility has charges of aggression, lengthy sentences or sexually related charges. As a medium facility, inmates have earned their way to lower custody, and the screening system has a built-in review that allows for the HRSA or HRSV to be overridden after clinical review and discussion. All residents are expected to work and are required to have a GED or a High School Diploma, and they must have served at least 15 years of their sentence. Many of the residents confirm they know the mental health services are available, but do not currently use it and report they are not worried in the environment of being a victim of sexual assault, as "that doesn't happen here."

Indicator (c) The State Farm Correctional Center is not a jail.

Indicator (d) The Auditor confirmed through interviews with intake staff, case management staff, medical staff, mental health staff, unit management, and the PREA Coordinator that sensitive information is protected. Custody staff cannot access information in the medical or mental health records. Information obtained and

documented in VACORIS is also limited in access to those individuals who need to know. Through the unit management process, line staff are provided only with specific information about who may be a potential or known victim or perpetrator. The Health Service Administrator provided information on the healthcare staff's efforts to ensure the confidentiality of information that could be used against an inmate. The inmates interviewed supported the idea that information given to counseling staff would be kept confidential. DOC policy OP 730.2 states, "Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law." The Auditor was also able to observe the tour record storage and obtain a description of how screening information may be siloed, with most staff having limited access.

Indicator (e) All inmates are educated, with healthcare staff, on an understanding of the limits of confidentiality as it relates to criminal behaviors and sexual abuse information. Inmates interviewed confirmed both that they had signed acknowledgment forms, and they verbally understood the reasons why a medical or mental health staff must disclose actual sexual abuse or imminent risk situations. Inmate interviews suggest that they understood the limitations on the confidentiality of information shared with medical or qualified mental health professionals. Agency policy 730.6 MHWS Confidentiality provides detailed information on the treatment provider's confidentiality limits. "Limits of confidentiality - A DOC Psychology Associate may share information related to the mental health status and/or treatment needs of an inmate/probationer/parolee without the inmate's/probationer's/parolee's consent in the following circumstances: (see Duty to Protect section of this operating procedure)

1. When the Psychology Associate considers the inmate/probationer/parolee to be a danger to self or to others;
2. When the Psychology Associate considers the inmate/probationer/parolee to be a risk to the safe and secure operation of the facility;
3. In the event of suspected or reported abuse, neglect, or exploitation of a child, when the child is under the age of 18 years;
4. In the event of suspected or reported abuse, neglect, or exploitation of an aged or incapacitated adult per COV §63.2-1606, Protection of aged or incapacitated adults; mandated and voluntary reporting;
5. In the event of suspected or reported sexual abuse or sexual assault of another inmate/probationer/parolee;
6. In the event of a court-ordered evaluation or other court order;

	7. As required for the purposes of sexually violent predator evaluations in accordance with COV §37.2-905.2, Access to records; and 8. As required by state or federal law, including but not limited to COV §53.1-40.10, the Exchange of Medical and Mental Information and Records.” There were no required notifications to outside agencies by BCC for sexual abuse incidents that had not occurred in an institutional setting. There were no individuals under 18 at State Farm Correctional Center. Compliance Determination: All inmates are screened when they arrive at the State Farm Correctional Center. Inmates are seen by medical and mental health staff, and the screening process is reviewed in a Unit Management team meeting within 14 days of admission. Inmates with sexual assault histories and sexual victimization histories are offered treatment. Inmates admitted to the facility are assessed by Medical and Mental Health staff. In addition to the DOC PREA screening, the medical staff has several intake questions that are PREA-related. The secondary questioning allows inmates who did not disclose concerns at admission a second opportunity to disclose in a medical environment. Inmate medical and mental health records are not accessible to the custody staff. VACORIS, the DOC electronic case management system, has access controls, and similarly, Electronic Medical Records (EMR) limit access to the most sensitive information, protecting inmates from having their information exploited. Supporting documentation provided to the Auditor showed how medical or custody staff inform Mental Health, which follows up on any disclosure of sexual abuse or victimization histories. Compliance was based on policy, the treatment records provided, the ability of SFCC to provide treatment follow-up within 14 days, and the security of records and information provided on tours by the Medical and Mental Health staff. Interviews with inmates were also considered, as they provided insight into the availability of medical and mental health services and how to access them.
--	---

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – OP 038.3 Prison Rape Elimination Act Policy – OP 720.7 Emergency Medical Equipment Care

Policy – OP 730.2 MHS Screening Assessment and & Classification

VA Dept Criminal Justice – Sane Program Information/map

VA State Law 19.2-165.1

Sexual assault checklist

Memo from Warden

Individuals interviewed/ observations made.

Interviews with Medical Professionals

Interview with Sexual Assault Nurse Examiner

Interviews with First Responders

Information Provided by IANF

Indicator Summary Determination

Indicator (a) The State Farm Correctional Center has a full-service medical clinic that operates around the clock. Registered nurses are available 24 hours per day at SFCC. After hours, on-call medical and mental health practitioners are also available. The services are diverse and consistent with community health clinics. Inmates report access to these services if they are in crisis. Medical staff report having medical autonomy if the inmate must go out of the building for emergency services to facilitate that trip. The medical staff states the facility administration is supportive of the work they do, and they work to resolve issues when they arise. In the event of a sexual assault, inmates at SFCC would go to VCU health services in Richmond, which has SANE-trained nursing availability. VCU confirmed victims would be allowed support from local rape crisis agencies. The policy and facility response plan supported immediate referrals to the facility's medical and mental health providers. There were no cases at State Farm Correctional Center in the past year that required a victim to be referred for a forensic exam for sexual abuse.

The Virginia DOC policy OP 720.7 Emergency Equipment and Care set forth the requirement for access to care for victims of sexual abuse. “Offender victims of sexual abuse will 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; see DOC Nursing Evaluation Tools -Sexual Assault.” Nurses confirmed that an inmate can

be transferred to the hospital within a half hour.

Indicator (b) Medical services are available 24 hours daily through onsite nursing. Residents in need of forensic exams will be sent to VCU Richmond. The local rape crisis agency reported that the closer VCU facility no longer has SANE nurses to complete forensic exams, so the DOC will have the victim sent to Richmond. Some staff members knew, as part of their first responder duties, that immediate notification to medical personnel was required. Notification to medical is also stated in the facility's Sexual Assault Response plan. The DOC policy OP 038.3 Prison Rape Elimination Act (page 10) states, "If there are no qualified medical or mental health practitioners on duty at the time a report of sexual assault or sexual abuse is made, the OIC must immediately notify the facility's designated medical and mental health practitioner." An interview with the medical staff confirmed that if a practitioner is not on-site, the medical team will contact them. Interviews with medical and mental health staff confirmed that they are aware of ensuring medical and mental health services are offered promptly. The PREA Compliance Manager confirms that medical staff are always present to respond to inmate medical needs.

Indicator (c) Discussions with both Hospital staff and facility medical staff confirmed that sexual assault victims would be offered prophylaxis medications and emergency contraception if there were females at the facility. The Auditor confirmed that the same medications would be offered to the inmate again upon return from a forensic examination, even if they had initially denied them. Medical staff confirmed that they would educate the inmate on the importance of these medications for maintaining their health.

Indicator (d) The Auditor confirmed that medical services related to sexual assault victims are provided without cost. Policy OP 720.7 Emergency Medical Equipment and Care (page 8) states, "Treatment services will be 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." The medical unit at State Farm Correctional Center would function as the aftercare by providing medical follow-up care and ensuring mental health services are offered. Virginia state code 19.2-165.1 also confirms that there is no cost for sexual abuse forensic exam and treatment and that a victim is not required to cooperate in the subsequent investigation to receive services. "Patients are not required to report the crime to law enforcement, nor cooperate with an investigation in order to request a Physical Evidence Recover Kit (PERK) exam or for that exam to be paid per § 19.2-165.1 (B) All medical fees expended in the gathering of evidence through physical evidence recovery kit

	examinations conducted on victims complaining of sexual assault under Article 7 (§18.2-61 et seq.) of Chapter 4 of Title 18.2 shall be paid by the Commonwealth pursuant to subsection F of § 19.2-368.11:1. Victims complaining of sexual assault shall not be required to participate in the criminal justice system or cooperate with law enforcement authorities in order to be provided with such forensic medical exams.” The Virginia DOC previously charged co-pays for general medical services, but a memo confirmed that this practice has been rescinded. Compliance Determination: The Virginia Department of Corrections can quickly respond to emergencies and provide emergency care, as well as referrals to hospitals for forensic services. Each DOC facility’s response plan for PREA incidents outlines the steps taken to ensure access to care. The State Farm Correctional Center has on-site medical and nursing staff available 24 hours a day. The facility also has on-call providers who can assist in facilitating referrals to outside medical providers. Health Service will follow the requirements as outlined in several policies. The Auditor confirmed SAFE or SANE capabilities are available at the emergency room at the VCU campus in Richmond, approximately 60 miles away. As part of the audit process, the Auditor spoke to a hospital representative to confirm access to SANEs and the services provided to victims of sexual assault. There is no financial cost to any inmate in DOC; this was confirmed with hospital staff and the forensic services provider. The SANE Nurse confirmed they follow the protocols of the International Association of Forensic Nurses, which supports that they offer victims HIV testing, prophylaxis treatments for STDs, and emergency contraception if the inmate is female. The compliance determination took into consideration access to services in the community and the facility. Virginia DOC policies and information from the completed interviews further supported the complaint determination.
--	--

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – 720.4 Co-Payment for Health Care Services Policy – 720.7 Emergency Medical Equipment and Care Policy – 730.2 MHS Screening Assessment and Care

Memo from Warden

Individuals interviewed/ observations made.

Interviews with Medical Professionals

Interviews with Mental Health Professionals

Interview with SANE

Indicator Summary Determination

Indicator (a) The Virginia Department of Corrections ensures that all inmates are provided with the appropriate level of medical and mental health services for any issues of sexual abuse. Healthcare Services staff will provide the appropriate level of care, depending on how long ago the abuse occurred. If the incident has occurred recently, the inmate will be offered a forensic exam at the VCU Health Services Richmond Campus. If the incident is a prior life event that occurred in another institution or the community, the medical and mental health teams will complete a health assessment and a mental health referral for services. If the inmate is more comfortable discussing the abuse with a rape crisis agency staff person, a mental health referral can be made to Action Alliance to provide the appropriate level of supportive counseling. Virginia DOC Policy 720.7 states, "The facility will offer medical and mental health evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility." Neither of the two cases investigated in the past year resulted in a sexual assault. In one case, all parties denied the allegations made by an anonymous reporter. The individuals were all offered medical and mental health follow-up but refused services. The other cases of potential sexual harassment did result in a referral to mental health.

Indicator (b) Inmates who are victims of sexual assault in a Virginia correctional institution are immediately referred to mental health services as well as medical services. Even if the assault occurred in the community or at a county jail, the inmate, once identified, is referred to mental health staff for follow-up services. If the inmate prefers, they can be referred to Action Alliance for support services after an incident of sexual misconduct. The Medical and Mental Health staff spoken to confirmed, as did the Action Alliance representative, that they would make referrals to ensure continuity of care if the inmate were released home or transferred to another facility. The Action Alliance, based in Richmond, would identify a Rape Crisis Agency near the State Farm Correctional Center to provide the appropriate support services, if in-person support is preferred.

Indicator (c) As noted in indicator (a), the medical clinic at the State Farm Correctional Centers is equivalent to an urban community medical clinic. The facility offers a comprehensive range of medical and mental health services, including dental and vision care. The infirmary addresses the needs of illnesses associated with the wide age range at SFCC. The facility provides mental health services, including counseling, medication management, and, when needed, the extra support of the mental health unit or direct observation room in the clinic space. The supportive care for victims of sexual abuse is equivalent to the community level. The clinic included infirmary beds, exam rooms, and a dental clinic.

Indicator (d) The Indicator does not apply as State Farm Correctional Center is an all-male institution. Agency policy covers expected services for female inmates post-incidents of sexual abuse.

Indicator (e) The Indicator does not apply as State Farm Correctional Center is an all-male institution. Agency policy covers expected services for female inmates post-incidents of sexual abuse.

Indicator (f) The Auditor confirmed with both the medical staff at SFCC and the representatives of the VCU Health Services Richmond Campus used by SFCC that victims of sexual assault would be offered testing for sexually transmitted diseases. This testing is provided free of charge and is consistent with agency policy. The Auditor was provided information that no inmates required any follow-up services for possible sexually transmitted diseases.

Indicator (g) Treatment services are provided to victims of sexual abuse without cost to the inmate, including if the inmate must go out for a forensic exam. Policy OP 720.7 Emergency Medical Equipment and Care (page 9) states, "Treatment services will be 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."

Indicator (h) All individuals involved in a sexual assault, both the victim and perpetrator, are referred for mental health assessments; if the individual chooses not to speak to healthcare staff, they can also be referred to the local rape crisis agency, Action Alliance. Action Alliance can coordinate phone support for victims and work with the facility and the nearest rape crisis organization to be able to provide on-site support in a non-pandemic period. The Auditor recommended reconnecting with the

	local agency's representatives to build on the relationship. Compliance Determination: The Virginia Department of Corrections ensures inmates have ongoing access to services. The DOC has several policies that address the healthcare needs of inmates, including services available to victims of sexual abuse. The Auditor reviewed the policies and found several references that address standard indicators along with information from the PREA policies. DOC health services providers would provide follow-up medical and mental health services for victims of sexual assault or perpetrators of sexual offenses. Healthcare would ensure that all medical needs and follow-up treatment would be provided after an initial referral to VCU Health Services Richmond for a forensic examination. Medical staff confirmed that they could educate inmates about the importance of testing and prophylactic treatment if they initially refused these treatments at the hospital. Absent an inmate victim, compliance is based on policy consistent with the standard, the resources available on-site and at the identified hospital, interviews with medical and mental health staff, and interviews with representatives of the Action Alliance.
--	---

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – 038.1 Reporting Serious and Unusual Incidents Policy – 038.3 Prison Rape Elimination Act. Investigation Files PREA Report of Incident Review Form Individuals interviewed/ observations. Interviews with Incident Review Member Interview with PREA Compliance Manager Interviews with the PREA Analyst

Interview with the facility Warden

Indicator Summary Determination

Indicator (a) Virginia Department of Corrections policy OP 038.1, Reporting Serious and Unusual Incidents (pages 10-12), sets forth the requirement for an incident review in all cases of sexual misconduct, unless the investigation has determined that the allegation was unfounded. The policy states, "A sexual abuse incident review shall be conducted 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. The Virginia Department of Corrections requires a critical review of substantiated cases of sexual harassment or other serious incidents should be critically reviewed. "A sexual harassment incident review, PREA Report of Incident Review 038_F11, will be conducted at the conclusion of every investigation into an allegation of sexual harassment where the allegation has been determined to be substantiated. Other incidents deemed to need a critical review as determined by the Unit Head, Regional Administrator, Regional Operations Chief, or Chief of Corrections Operations." At the time of the audit, State Farm Correctional Center had 2 sexual abuse cases of which one was substantiated, and one was unsubstantiated in the 12 previous months. A third case was investigated but determined not to be a PREA case by definition.

Indicator (b) Policy OP 038.1 states that the review should occur within 14 days of the conclusion of the investigation. "The review for sexual abuse and sexual harassment will be conducted within 14 days of completion of the investigation on a PREA Report of Incident Review 038_F11. The PREA Compliance Manager will forward the PREA Report of Incident Review to the Regional PREA Analyst for review and approval prior to submission to the Regional Office." The Auditor reviewed all the investigative files to determine if an incident review team should have been called on any of the cases. During a review, it was determined that no cases required a review. Discussions with the PREA Compliance Manager, the Deputy Warden, and the PREA Analyst confirm that they understand the standard requires reviews to be completed within 30 days. The Virginia DOC expected review period is sooner than the standard requirement.

Indicator (c) The Department of Corrections policy language addresses the multi-disciplinary nature of the team. It states, "The Review Team should consist of at least 2 DOC employees designated by the Unit Head. The Review Team shall consist of at least one Administrative Duty Officer who will solicit input from the PREA Compliance Manager, line supervisors, investigators, and medical or mental health practitioners for all sexual abuse and harassment incident reviews." The Auditor reviewed the multidisciplinary nature of the committee with the Deputy Warden and that medical and mental health teams should be involved in these reviews

Indicator (d) The elements described in this indicator are all covered in policy OP 038.1. which states,

“a. Provide a brief summary of the incident; clarify the original Incident Report or Internal Incident Report, as needed.

b. Provide an analysis of the causal factors and contributing circumstances

i. Was the incident or allegation motivated by race, ethnicity, gender identity; lesbian, gay, bisexual, transgender or intersex identification, status, or perceived status; or gang affiliation, or was it motivated or otherwise caused by other group dynamics at the facility.

ii. Assess the adequacy of staffing in that area during different shifts.

iii. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

c. Determine what can be done to limit the occurrence or reduce the severity of future incidents; consider whether there was a proper application of current procedure, practice, staffing and/ or training; or whether there is a need to revise the current procedure, practice, staffing, and/ or training.

d. Develop an Action Plan to limit or mitigate similar future incidents. The unit shall implement the recommendations for improvement or shall document its reasons for not doing so.”

The agency form used to document the review panel's considerations includes the required information listed above. The PREA Office believes the form supports consistent documentation of information supporting a critical review of the situation on the abovementioned elements. The Auditor reviewed the form and found that the questions were present and the answered.

Indicator (e) Interviews with the Deputy Warden, the PREA Analyst, and the PREA Compliance Manager support the idea that there are systems in place to ensure the information obtained in the review can be used to make changes in the facility. The Deputy Warden reports that the post-incident review of a sexual assault case had recommendations, result in a plan action to implement a plan based on the committee’s recommendation to reduce risk. In the two cases reviewed there were recommendations for additional monitoring technology and additional training. Though the nature of these incidents did not require medical intervention healthcare staff could provide an additional perspective.

	Compliance Determination The Virginia DOC policy requires the completion of the steps outlined in this standard. The policy outlines the steps to provide for a critical incident review on all PREA sexual assault cases. The policy requires that the necessary information be included in the incident review, as specified in the standard's language. Procedural changes could also be implemented to enhance supervision or training enhancements if the committee's findings supported such a change. The information supported the fact that the questions in indicator D were asked and answered. The review team included a multi-disciplinary management, custody, and the auditor recommended healthcare staff be part of the team.
--	---

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – OP 038.3 Prison Rape Elimination Act Agency annual report Bureau of Justice Survey SFCC PREA Incident logs Individuals interviewed/ observations made. Interviews with the PREA Coordinator Interview with PREA Compliance Manager Interviews with the Director of the Department of Corrections representative Indicator Summary Determination Indicator (a) The agency collects data that is consistent with the policy definitions developed to be consistent with the standard. Policy OP 038.3 states, “The DOC collects accurate, uniform data on every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually.” The Auditor was

provided a copy of the state's past PREA annual reports, which show consistent information from each of Virginia's facilities. The Director confirmed that data is used to improve the agency's ongoing effort to protect, detect, and respond to incidents of sexual abuse and sexual harassment.

Indicator (b) The agency completes an annual report with aggregate data from the State Farm Correctional Center. The Auditor was able to see the data from 2014 to 2025. The Auditor reviewed the agency's annual report, which was published on the state website.

Indicator (c) The Auditor was able to confirm the various elements of the Survey of Sexual Violence are maintained and could be used to complete the report if requested by the Department of Justice. There has not been a request by the Department of Justice for a Survey of Sexual Violence report for the State Farm Correctional Center in the past year. Interviews with the facility PREA Compliance Manager, the PREA Analyst, and the state PREA Coordinator confirmed the required elements were tracked. The Auditor also took into consideration information reviewed in investigatory files and Incident tracking reports and the examples of surveys of sexual violence completed between 2014 and 2025.

Indicator (d) The agency has rules on the retention of records at all DOC facilities. Copies of criminal files involving inmate-on-inmate contact will be retained locally, and a copy will be sent to the agency's PREA Office. The PREA Coordinator would receive all incident outcomes and ensure the accuracy of the data.

Indicator (e) The Department of Corrections no longer has contracted bed with any other agency.

Indicator (f) The Agency provides completed reports for US DOJ each year dating back to 2014. The documentation is a completed version of the federal form.

Compliance Determination:

The Auditor found the standard to be compliant. The Virginia DOC has a system in place for collecting uniform data that could be used to complete the Survey of Sexual Violence. The Virginia Department of Corrections' annual PREA report outlines the efforts, including data on each of Virginia's DOC facilities. The agency's policy OP 038.3, Prison Rape Elimination Act, commits the agency to comply with the data collection requirement of the standard. The Director of the DOC stated his

	commitment to utilizing data in the agency’s ongoing efforts to prevent sexual misconduct. Interviews with the Director's representative, the PREA Coordinator, the PREA Compliance Monitor, and information from the PREA Analyst support the development of a system to collect uniform data. The Auditor considered policy language, interviews, and the various documents and data collected, which are used at the statewide and facility levels.
--	---

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – OP 038.3 Prison Rape Elimination Act VA DOC Annual PREA Report Individuals interviewed/ observations made. Interview with the Director of the Department of Corrections representative Interview with Deputy Warden Interview with PREA Coordinator Interview with PREA Analyst Indicator Summary Determination Indicator (a)The Virginia Department of Corrections utilizes data related to PREA incidents and other critical safety incidents to determine program improvements. The department’s central office staff and the facility’s administrative teams review critical incidents to improve safety. Interviews with the Warden and the Director of the Department of Corrections support critical analysis, which occurs not only at the facility level but also at the system level. The Warden also confirmed that her team looks for trends in any critical incident to further guide policy/ procedural practices, as well as the disbursement of resources. The Director reports that the agency is data-driven and employs teams to assess and evaluate information that can be shared with the facilities.

	Indicator (b) The Virginia Department of Corrections annual report has a comparison by each facility on the number of sexual assault and sexual harassment claims. Data compares the current year to the prior year's data and includes the one contracted facility. The report indicates whether the accused was a staff member or an inmate and provides the outcome determination. The report also tracks PREA-related improvements across its facilities. The report also reviews the number of complaints reported through the state hotline via the PREA/ADA unit. Indicator (c) The Director of the Department of Corrections confirms he approves the PREA report developed by the agency's PREA Coordinator before being placed on the agency's website. OP 038.3 states, "The report must be approved by the PREA/ADA Supervisor and the Director and made readily available to the public through the DOC Public website." Indicator (d) The DOC removes all identifiers from summary reports. The Auditor was able to review several documented reports on PREA that show cumulative data without utilizing identifiers. Compliance Determination: The Virginia Department of Corrections meets the requirements of this standard in policy OP 038.3 (pages 14-15), which defines the use of data. The DOC Director's Representative and the Warden acknowledged that they both utilize data to make informed decisions regarding programmatic and policy needs. This is consistent with the standard expectation of critically reviewing data to identify problem areas and implementing corrective actions. The PREA Coordinator and her team of analysts can identify trends that can be reviewed and support change at either the facility level or system level. The agency also complied with PREA standards by publishing annual reports that combined data, graphs, and narrative information on Virginia's efforts since 2014 in developing PREA-safe facilities. The report highlights each facility and tracks incident trends without identifying information.
--	---

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – OP 038.3 Prison Rape Elimination Act

Policy – OP 050.1 Inmate Record Management
PREA Annual Report
VACORIS

Individuals interviewed/ observations made.
Interviews with the PREA Coordinator
Interview with PREA Analyst
Interviews with the PREA Compliance Manager
Interviews with Investigators
Interviews with Screening staff

Indicator Summary Determination

Indicator (a) The Virginia Department of Corrections has policies that protect information security. Policy OP 038.3, the PREA policy, states, “All data collected on allegations of sexual abuse at DOC facilities must be securely retained.” Policy OP 050.1 Inmate Records Management governs the establishment, utilization, content, privacy, secure placement, preservation, and security of Inmate records, the dissemination of information from these records, and instructions for retiring or destroying inactive records. Discussions with the PREA Coordinator, the individual who completes screenings, the Investigator, and medical and mental health staff describe layers of controls in place to ensure no unnecessary disclosure. The Investigative Officer for State Farm Correctional Center has a secure office. Final reports are also filed with the PREA Office. Criminal cases related to staff action files would not be held on-site but would be maintained by the Special Investigation Unit (OLES).

Indicator (b) The Virginia Department of Corrections ensures the information related to PREA incidents and the agency’s efforts to support a zero-tolerance culture are published in an annual report available on the agency website. The annual report describes the agency and facility's efforts to create and maintain PREA-safe environments. The website also includes information on PREA incidents at the contracted facility. A review of the state’s website supports the annual reports dating back to 2014.

Indicator (c) The annual report on the state’s website does not include identifiers.

Indicator (d) Policy OP 038.3 sets forth the obligations of the agency’s PREA Coordinator, including collecting all incidents. The policy states, “All sexual abuse data collected must be maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.” Virginia DOC Policies OP 050.1 and OP 025.1 outline controls and record retention procedures. The Agency PREA Coordinator is aware that all PREA-related data must be maintained for a period of no less than 10 years.

Compliance Determination:

The Standard is compliant. The Auditor based this conclusion on a review of the agency's policies and procedures, observations, and information obtained through various staff interviews and a review of documentation at the facility and on the agency's website.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard Auditor Discussion Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire Policy – OP 038.3 Prison Rape Elimination Act Virginia DOC Website Individuals interviewed/ observations. Interviews with the PREA Coordinator Interview with PREA Analyst Interviews with the PREA Compliance Manager Tour of SFCC Indicator Summary Determination Indicator (a) The Virginia DOC has several of its 42 facilities audited in a year. The Agency has Audits scheduled across all three years of the current audit cycle. A review of the auditor bid document and the agency website confirms that PREA audits have been completed consistently since the inception of the PREA audit. The state currently has no contracted facility for beds. The previous contracted facility was returned to the Department of Corrections' control early in 2024. Indicator (b) This is year three of the Audit cycle, and from information provided and found on the agency website, at least one-third of the facilities had a PREA Audit completed in the first year. Indicator (h) The Auditor did have open access to all parts of the facility. The auditor was able to move freely about the housing units during the tour, speaking informally with inmates and staff to ensure they were aware of the audit. The Auditor was able to ask about the agency's efforts to educate inmates and how to seek assistance if the need arises. Inmates also aided in testing the reporting systems on the phone systems.

Indicator (i) The Virginia Department of Corrections provided the Auditor with electronic PREA auditing files in the Online Audit System. The Auditor, Facility Leadership, the PREA Coordinator, and the Regional PREA Analyst held Zoom meetings to review materials and set up information that the Auditor would like to review on-site. The Auditor also got copies of other documentation as requested on-site. The Agency provided materials in an organized manner in the Online Audit System.

Indicator (m) The Auditor interviewed inmates throughout the facility in private spaces. The space provided was appropriate to allow the Auditor and the inmate to speak freely without others being able to hear our conversations.

Indicator (n) The Auditor did receive confidential mailings from inmates, staff, or other interested parties. The Auditor's information was posted, and the facility's PREA Compliance Manager was informed that the posting should remain up until the final report is issued. During the onsite visit, the auditor made it clear that individuals who requested to be seen would be added to the random sampling of staff and inmates to be interviewed. The Auditor spoke with individuals who had requested to be seen in advance or while on site. One letter was received after the site visit had occurred, to which the Auditor responded in writing.

Compliance Determination:

The Virginia Department of Corrections has had PREA audits of each of its 42 facilities since 2014. The DOC has spread its facility audits over the three-year PREA cycle and has set up strong deadlines when contracting for new beds to be PREA compliant, including undergoing formal audits. The Auditor was given full access to the prison and was not prohibited from returning to certain areas of the facility if requested. The Auditor was provided ample space and privacy to conduct confidential interviews with staff and inmates. The Auditor tested critical functions, including accessing confidential support and outside reporting options in the facility, and was provided access to translation services to interview potential LEP inmates. The facility posted the audit notice, which was visible during the tour, and inmates were aware of both the posting and the audit. Compliance is based on the aforementioned facts, which support a culture in which PREA is monitored on a daily basis.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Policies and written/electronic documentation reviewed. State Farm Correctional Center Pre-Audit Questionnaire VA Department of Corrections Website Individuals interviewed/ observations made. Interview with PREA Coordinator Indicator Summary Determination Indicator: (f) The Virginia Department of Corrections website has posted all the previous PREA Audits. This Auditor reviewed the state’s DOC Website to assess compliance. The Department of Corrections has published all PREA reports dating back to the agency's first PREA Audits in 2014. This audit is the first PREA Audit for State Farm Correctional Center. Compliance Determination: The Virginia Department of Corrections website posts all previous facility PREA audits under its PREA information link. The Auditor’s prior experience with the agency allows first-hand knowledge of the prompt uploading of these documents. The Auditor also considered that the Agency PREA Coordinator was also aware of the timing requirement for posting the audit report.

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

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

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

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

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

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

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

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b) Hiring and promotion decisions		
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c) Hiring and promotion decisions		
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d) Hiring and promotion decisions		
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e) Hiring and promotion decisions		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f) Hiring and promotion decisions		
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have	yes

	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?	
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	yes

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

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

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with	yes

	inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	

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

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

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

	health care practitioners who work regularly in its facilities.)	
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective 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	yes

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

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

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

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	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	yes

	can be arranged?	
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.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision,	yes

	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.)	
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days?	yes

	(N/A if agency is exempt from this standard.)	
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of	yes

	understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a 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	yes

	confidentiality, at the initiation of services?	
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report	yes

	required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate	yes

	with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations 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
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has	yes

	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?	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who	yes

	have engaged in sexual abuse?	
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	

	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	

	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph §	na

	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.)	
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports,	yes

	investigation files, and sexual abuse incident reviews?	
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted	yes

	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?	
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by	na

	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.)	
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse 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