## **PREA Facility Audit Report: Final**

Name of Facility: Troop B Canaan

Facility Type: Lockups

**Date Interim Report Submitted:** NA **Date Final Report Submitted:** 05/24/2025

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: Adam T. Barnett, Sr. Date of Signature: 05		24/2025

AUDITOR INFORMATION		
Auditor name:	Barnett, Adam	
Email:	adam30906@gmail.com	
Start Date of On- Site Audit:	04/22/2025	
End Date of On-Site Audit:	04/23/2025	

FACILITY INFORMATION		
Facility name:	Troop B Canaan	
Facility physical address:	Route 7, 463 Ashley Falls Road, Canaan, Connecticut - 06018	
Facility mailing address:		

## **Primary Contact**

Name:	Lietenant Susan Cecil
Email Address:	susan.cecil@ct.gov
Telephone Number:	2036304357

Sheriff/Chief/Director	
Name:	Lieutenant Jeremy Combes
Email Address:	jeremy.combes@ct.gov
Telephone Number:	860-626-1820

Facility PREA Compliance Manager		
Name:		
Email Address:		
Telephone Number:		

Facility Characteristics		
Designed facility capacity:	3	
Current population of facility:	0	
Average daily population for the past 12 months:	0	
Has the facility been over capacity at any point in the past 12 months?	No	
What is the facility's population designation?	Both women/girls and men/boys	
In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of "intersex" and "transgender," please see		

https://www.prearesourcecenter.org/ standard/115-5)	
Age range of population:	18-70
Facility security levels/detainee custody levels:	Temporary Holding
Does the facility hold juveniles or youthful detainees?	Yes
Number of staff currently employed at the facility who may have contact with detainees:	40
Number of individual contractors who have contact with detainees, currently authorized to enter the facility:	0
Number of volunteers who have contact with detainees, currently authorized to enter the facility:	0

AGENCY INFORMATION		
Name of agency:	Connecticut State Police	
Governing authority or parent agency (if applicable):		
Physical Address:	1111 Country Club Road, Middletown, Connecticut - 06457	
Mailing Address:		
Telephone number:		

Agency Chief Executive Officer Information:		
Name:	Colonel Daniel Loughman	
Email Address:	Daniel.Loughman@ct.gov	
Telephone Number:		

Agency-Wide PREA Coordinator Information			
Name:	Susan Cecil	Email Address:	Susan.cecil@ct.gov

## **Facility AUDIT FINDINGS**

### **Summary of Audit Findings**

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

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

Number of standards exceeded:			
0			
Number of standards met:			
35			
Number of standards not met:			
0			

POST-AUDIT REPORTING INFORMATION	
GENERAL AUDIT INFORMATION	
On-site Audit Dates	
1. Start date of the onsite portion of the audit:	2025-04-22
2. End date of the onsite portion of the audit:	2025-04-23
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?	<ul><li>Yes</li><li>No</li></ul>
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Justice International Detention: Information requested submitted April 24, 2025. No response.  Connecticut Alliance to End Sexual Violence: Hotline First Call - April 3, 2025, at 10:18 am (1-888-999-5545) to test the English line. The call was answered by staff.
AUDITED FACILITY INFORMATION	
14. Designated facility capacity:	3
15. Average daily population for the past 12 months:	0
16. Number of inmate/resident/detainee housing units:	1
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<ul> <li>Yes</li> <li>No</li> <li>Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</li> </ul>

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Char of the Audit	racteristics on Day One of the Onsite Portion
18. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	0
19. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
20. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
21. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
22. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
23. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
24. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0

25. 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:	0
26. 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
27. 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
28. 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
29. 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
30. 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 Portion of the Audit	Characteristics on Day One of the Onsite
31. 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:	60

32. 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:	0
33. 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:	0
34. 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	
35. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	0
36. Select which characteristics you	Age
considered when you selected RANDOM INMATE/RESIDENT/DETAINEE	Race
interviewees: (select all that apply)	Ethnicity (e.g., Hispanic, Non-Hispanic)
	Length of time in the facility
	Housing assignment
	Gender
	Other
	■ None
If "None," explain:	There were no allegations to investigate.

37. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	No Detainees onsite to conduct interviews.
38. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	○ Yes ● No
38. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:	No Detainees onsite to conduct interviews.
39. 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 Detainees onsite to conduct interviews.
Targeted Inmate/Resident/Detainee Interview	rs
40. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	0
As stated in the PREA Auditor Handbook, the bre guide auditors in interviewing the appropriate cr are the most vulnerable to sexual abuse and sex regarding targeted inmate/resident/detainee into one inmate/resident/detainee may satisfy multip questions are asking about the number of interv resident/detainee protocols. For example, if an a disability, is being held in segregated housing duprior sexual victimization, that interview would be	oss-section of inmates/residents/detainees who tual harassment. When completing questions erviews below, remember that an interview with le targeted interview requirements. These iews conducted using the targeted inmate/uditor interviews an inmate who has a physical ue 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".

41. Enter the total number of interviews	0
conducted with youthful inmates or	
youthful/juvenile detainees using the	
"Youthful Inmates" protocol:	

41. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees.  ■ The inmates/detainees in this targeted category declined to be interviewed.
41. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).	No Detainees onsite to conduct interviews.
42. Enter the total number of interviews conducted with inmates/residents/ detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
42. 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.
42. 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).	No Detainees onsite to conduct interviews.

43. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	0
43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	<ul> <li>■ 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.</li> <li>■ The inmates/residents/detainees in this targeted category declined to be interviewed.</li> </ul>
43. 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).	No Detainees onsite to conduct interviews.
44. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0
44. 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.

44. 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).	No Detainees onsite to conduct interviews.
45. 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:	0
45. 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.
45. 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).	No Detainees onsite to conduct interviews.
46. 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:	0
46. 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.

46. 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).	No Detainees onsite to conduct interviews.
47. 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:	0
47. 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.
47. 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).	No Detainees onsite to conduct interviews.
48. 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
48. 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.

48. 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).  49. Enter the total number of interviews conducted with inmates/residents/	No Detainees onsite to conduct interviews.  0
detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	
49. 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.
49. 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).	No Detainees onsite to conduct interviews.
50. 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
50. 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.

50. 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).	No Detainees onsite to conduct interviews.
51. 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
51. 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.
51. Discuss your corroboration	No Detainees onsite to conduct interviews.
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).	
52. 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 Interv	views
Random Staff Interviews	
53. Enter the total number of RANDOM STAFF who were interviewed:	12

54. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<ul> <li>Length of tenure in the facility</li> <li>Shift assignment</li> <li>Work assignment</li> <li>Rank (or equivalent)</li> <li>Other (e.g., gender, race, ethnicity, languages spoken)</li> <li>None</li> </ul>
If "Other," describe:	Gender and Race.
55. Were you able to conduct the minimum number of RANDOM STAFF	Yes
interviews?	No
56. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor	Interviews
Staff in some facilities may be responsible for more than one interview protocol may member and that information would satisfy multi	apply to an interview with a single staff
57. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	10
58. Were you able to interview the Agency Head?	Yes
J	● No
58. Explain why it was not possible to interview the Agency Head:	Agency Head Designee.

59. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	● Yes ○ No
60. Were you able to interview the PREA Coordinator?	<ul><li>Yes</li><li>No</li></ul>
61. Were you able to interview the PREA Compliance Manager?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</li> </ul>

62. Select which SPECIALIZED STAFF roles were interviewed as part of this	Agency contract administrator
audit from the list below: (select all that apply)	■ 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	
63. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	Yes  No	
64. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	Yes  No	
65. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.	
SITE REVIEW AND DOCUMENTATI	ON 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.		
66. Did you have access to all areas of the facility?	<ul><li>Yes</li><li>No</li></ul>	
Was the site review an active, inquiring proce	ess that included the following:	
67. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, crossgender viewing and searches)?	<ul><li>Yes</li><li>No</li></ul>	

68. 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)?	<ul><li>Yes</li><li>No</li></ul>		
69. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	Yes  No		
70. Informal conversations with staff during the site review (encouraged, not required)?	<ul><li>Yes</li><li>No</li></ul>		
71. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.		
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 muself-select for review a representative sample of each type of record.			
72. 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?	<ul><li>Yes</li><li>No</li></ul>		
73. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.		

# 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.

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

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

## 75. 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	
Inmate-on- inmate sexual harassment	0	0	0	0
Staff-on- inmate sexual harassment	0	0	0	0
Total	0	0	0	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

#### **Sexual Abuse Investigation Outcomes**

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

## 76. 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

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

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

#### **Sexual Harassment Investigation Outcomes**

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

## 78. 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

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

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

# Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

files:

# Sexual Abuse Investigation Files Selected for Review 80. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled: 80. Explain why you were unable to review any sexual abuse investigation There were no allegations to investigate.

81. 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
82. Enter the total number of INMATE- ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
83. 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)
84. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	No  NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation fil	es
85. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
86. 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)

87. 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 Select	ed for Review
88. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
88. Explain why you were unable to review any sexual harassment investigation files:	There were no allegations to investigate.
89. 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 investig	jation files
90. Enter the total number of INMATE- ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
91. 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)

92. 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		
93. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0	
94. 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)	
95. 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)	
96. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	There were no allegations to investigate.	

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

#### **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.

115.111	Zero tolerance of sexual abuse and sexual harassment	
	Auditor Overall Determination: Meets Standard	
	Auditor Discussion	
	Reasoning and Analysis (By Provisions):	
	115.111 (a)	
	The provision requires the agency to have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.	
	Documentary Evidence (Policy, Review of Documents)	
	Policy:	
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 1, Section B: DESPP has a zero tolerance toward all forms of sexual abuse and sexual harassment (28 CFR 115.111). The Division of State police do not tolerate retaliation against any person who reports sexual abuse or sexual harassment or who cooperates with a sexual abuse or sexual harassment investigation.	

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 1-3, Section C: provides a detailed list of definitions related to sexual abuse and sexual harassment.

#### **Review of Documents:**

Online Pre-Audit - PAQ: The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract.

Documentation indicated that the facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definition of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of detainees.

The auditor reviewed the agency's PREA policy title "Department of Emergency Services and Public Protection (DESPP) Policy A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures", includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

**Corrective Actions: None** 

#### **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

#### 115.111 (b)

The provision requires the agency to employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities.

#### **Documentary Evidence (Policy, Review of Documents)**

#### Policy:

DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 3-4, Section D: DESPP, through the Office of the Colonel of the Division State Police ensure that an upper-level employee is designated as the agency's PREA Coordinator.

DESPP policy states that the PREA coordinator has sufficient authority to develop,

implement, and oversee the department's efforts to comply with the PREA standards in all departmental lockups. The PREA coordinator's duties are:

- Take necessary action to ensure the department's compliance with the PREA standards, subject to the approval of the Commissioner.
- Annually submit a status report on PREA compliance standards, investigative training requirements and reported investigation incidents to the Commissioner.
- Detail any corrective action required to ensure compliance with the PREA standards.
- Review submitted staffing plans for all department lockup facilities.
- Liaison with other units within DESPP regarding necessary policy revisions and records retention matters pertaining to compliance with the PREA standards.
- Ensure required audits of lockup facilities are arranged and conducted, in conjunction with affected troop/unit commanders, to the extent that such audits are applicable to the department's facilities.
- Develop methods for staff to privately report sexual abuse and sexual harassment of detainees and prisoners.
- Develop a written plan to coordinate response among staff first responders, medical and mental health practitioners, investigators, and department leadership to an incident of sexual abuse.

#### **Review of Documents:**

Online Pre-Audit PAQ: The agency employs an upper-level PREA Coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The position is in the agency's organizational structure.

The positions and hierarchy within the DESPP were confirmed through a review of the agency organizational chart. The PREA Coordinator is part of the Accreditation Unit and is directly under the Commanding Officer/Bureau of Professional Standards. The PREA Coordinator is a full-time position dedicated to solely PREA compliance. The PREA Coordinator has sufficient time to manage PREA related responsibilities.

The organizational chart lists the PREA coordinator ranking as Lieutenant. She has access to the agency's upper-level senior leadership team.

The agency/facility has PREA policies which ensure the sexual safety of facility detainees and staff. The policy includes zero tolerance philosophy from the agency central office through the front-line staff in its facilities. The agency/facility PREA Coordinator has direct access to the head of the agency and regular communication with the senior leadership team.

In addition to the agency having a PREA Coordinator there is an agency wide PREA

Compliance Manager that assists in the process of monitoring the agency for compliance and providing the necessary tools and resources to staff.

A review of the Policy DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 3-4, Section D: includes PREA language.

Interviews: PREA Coordinator - Q: 1, 2, 3

The PREA coordinator (previously interviewed) discusses how she coordinates the agency's facilities efforts to comply with the PREA standards. District commanders conduct annual spot inspections of each troop in their district to ensure they are following the agency PREA policy and all PREA standards. Troops have a sergeant assigned as the PREA liaison. The sergeants are responsible for day-to-day PREA spot checks and ensuring compliance. When there is a non-complaint, the PREA coordinator is notified and follows along the investigation through closing.

The PREA coordinator (previously interviewed) reported that she has enough time to manage all her PREA related responsibilities.

The PREA coordinator (previously interviewed) confirmed that when she identifies an issue with complying with a PREA standard, the actions or processes she undertake to work towards compliance with the standard is to review the PREA standard, PREA policy, and identify if there is a need to change practice within the agency. Wherever there is a need for change, she would facilitate the change or coordinate additional training.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

**Corrective Actions: None** 

#### **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

#### **Overall Findings:**

The auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewing staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.112 Contracting with other entities for the confinement of detainees Auditor Overall Determination: Meets Standard

#### **Auditor Discussion**

#### **Reasoning and Analysis (By Provisions):**

#### 115.112 (a)

The provision requires a law enforcement agency that contracts for the confinement of its lockup detainees in lockups operated by private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligations to adopt and comply with the PREA Standards.

#### **Documentary Evidence (Policy, Review of Documents)**

Policy: N/A

#### **Review of Documents:**

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, the number of contracts for the confinement of Detainees that the agency entered or renewed with private entities or other government agency on or after August 20, 2012, or since the last PREA audit, whichever is later was zero. The number of above contracts that did not require contractors to adopt and comply with PREA standards was zero.

The agency has not contracted with another entity for the confinement of its detainees. The agency has no contractors that are required to adopt and comply with the PREA standards for the auditor to review.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

**Corrective Actions: None** 

#### **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

#### 115.112 (b)

The provision requires that any new contract or contract renewal should provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.

**Documentary Evidence (Policy, Review of Documents)** 

Policy: N/A

**Review of Documents: None** 

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ; the number of contracts referenced in 115.212 (a)-3 that do not require the agency to monitor the contractor's compliance with PREA standards was zero.

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ; the number of the above contracts that did not require contractors to adopt and comply with PREA standards was zero.

The agency/facility does not contract with another entity for the confinement of its detainees. The agency is not required to monitor any contractor for PREA compliance.

#### Interviews: Agency Contract Administrator - Q: 1, 2, 3

Through the interview process the Agency Contract Administrator (previously interviewed) indicated the DESSPP does not contract with private entities or other government agencies for the confinement of detainees.

## Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

**Corrective Actions: None** 

#### **Provision Findings (Compliance Determination)**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

#### **Overall Findings:**

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.113	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.113 (a)
	The provision requires, for each lockup, the agency to develop and document a

staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect detainees against sexual abuse. In calculating adequate levels of staffing levels and determining the need for video monitoring, agencies shall take into consideration: The physical layout of each lockup. The composition of the detainee population. The prevalence of substantiated and unsubstantiated incidents of sexual abuse. And any other relevant factors.

#### **Documentary Evidence (Policy, Review of Documents)**

#### **Policy:**

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures states for each lockup under the control of DESPP, a documented staffing plan be developed that provides for adequate levels of staffing, and where applicable, video monitoring to protect detainees against sexual abuse. The following factors are taken into consideration in calculating adequate staffing levels and determining the need for video monitoring:

- The physical layout of each lockup.
- The composition of the detainee population.
- $\cdot$  The prevalence of substantiated and unsubstantiated incidents of sexual abuse.
- · Any other relevant factors.

#### **Review of Documents:**

Online Pre-Audit Questionnaire indicates for each lockup, the agency develops and documents a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring to protect detainees against abuse.

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, since August 20, 2012, or last PREA audit, whichever later, the average daily number of Detainees was 2. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of Detainees on which the staffing plan was predicted was 4.

It is noted that the PAQ indicated that the average daily number of Detainees was 2, this number is incorrect the average daily number of Detainees is 0.

The auditor reviews the Connecticut State Police Troop B staff plan and confirmed that the language in the staffing plan included Pursuant to A&O 19.03-30 Prison Rape Elimination Act (PREA) standards and Procedures, Troop B has developed and documented a minimum staffing plan that provides for adequate levels of staffing and where applicable video monitoring, to protect arrestees/detainees against sexual abuse and sexual harassment.

In developing Troop B's staffing plan and determining whether any adjustments are needed, the following factors were taken into consideration:

- The physical layout of each facility.
- The composition and yearly average of the arrestee population.
- $\cdot$  The prevalence of substantiated and unsubstantiated incidents of sexual abuse.
- Any finding of inadequacy forms any federal, state, or administrative investigative agencies.
- Prevailing staffing patterns.
- The deployment of existing video monitoring systems or other monitoring technologies.

A review of the staffing plan confirmed that Troop B maintains minimum staffing levels of at least four (4) patrol troopers, one (1) desk officer, one (1) dispatcher (or additional Trooper), and one (1) supervisor consistent with the minimum patrol requirements.

The facility has cameras to supplement supervision of detainees. They are on the inside and outside area of the facility to help eliminate blind spots and to assist in monitoring detainees. Cameras monitor for site and sound. Additionally, staff can deploy body cameras if needed.

A review of the Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

## Interviews: Sheriff, Chief, or Director - Q: 1, 2, 3 / PREA Coordinator - Q: 4, 5

The Facility Commander reported that the facility has a staffing plan, there is minimal staffing onsite to include a desk trooper and a supervisor. A desk trooper does consistent video monitoring, and it is recorded. The plan is documented and located in the dispatch area. The staffing plan varies from shift to shift and weekdays to weekends. Video monitoring is constantly occurring in the facility processing area regardless of staffing levels. The site does not house detainees any longer than necessary. Every effort is made to separate detainees of the opposite sex and juveniles are not placed in the adult area. Additional staff can be called as necessary. The staffing plan will be reviewed as necessary and as problems arise. Troopers are on call 24/7.

PREA Coordinator (previously interviewed) reported that she is involved in the development of the staffing plan for the lockup. After the troop commander drafts or revises a staffing plan, it is sent to her for review and approval.

PREA Coordinator (previously interviewed) reported when assessing adequate staffing levels and the need for video monitoring, explaining that the facility staffing plan considers the physical layout of each lockup; the composition of the detainee

population; the prevalence of substantiated and unsubstantiated incidents of sexual abuse; any other relevant factors. The agency continuously monitors 24/7 with video monitoring in addition to body cameras worn by the troopers and officers. There is a desk officer assigned to each shift, and it is their responsibility to monitor all activity in the processing room and temporary holding facilities. Each lockup has single cell housing. The minimum staffing outlined is based on based upon the physical layout of the facility lockup cells. If the facility is full, the plan outlines where the overflow of detainees would be transported. If there ever was an overflow of detainees and the facility is not able to house them appropriately, the facility transports them to other state/local facility or DOC. The facilities are temporary holding facilities with single-cell housing. If there was a substantiated incident of sexual abuse it would most likely be against an employee, who would be terminated. If there were numerous unsubstantiated incidents, the agency may determine the need for more supervision in that location and there would be a constant review of the camera systems by the PREA coordinator unit. The agency will make changes as necessary.

# Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review the auditor compares the written staffing plan against the following observations to determine whether the staffing plan adequately assesses the staffing and electronic monitoring needs of the facility with sexual safety in mind, and whether the facility is staffed according to the plan, as it is written to determine whether deviations from the plan have been documented.

On the first day of the onsite audit the auditor observed the number of staff at the facility.

- Non-Law Enforcement Staff 2.
- Enforcement Staff 4.
- · Supervisor 1.
- · Volunteers 0.
- Contractors 0.

This included areas where people are confined, common spaces, and areas where sexual abuse is known to be more likely to occur.

Observation of the main control room/Dispatch room indicated that the staff line of sight is constantly monitored with the camera and sworn staff physically make rounds to check on detainees.

The auditor observed the cells where people identified to be vulnerable during risk screening are held to ensure they are either in a single cell, under constant direct sight and sound supervision, or in a cell under constant video surveillance by staff who are close enough to intervene.

Detainees under the age of 18 (Juveniles) are held in separate rooms if adults are on site. Juveniles do not typically go into the holding cells. They are usually there for no more than a few hours. Movement of a detainee is restricted to the holding area and to the release waiting room. Most juvenile are released to the parent before entering the facility. It was further reported that they always separate the male and female detainees. Additionally, it was reported that, if possible, they will have the same gender transport and supervision.

During the audit period, there were no signs that the facility was overcrowded. The lighting in the cells and hallway was checked. Informal conversations with staff indicated that they did not have concerns regarding the facility operations. Informal conversation with staff indicated that there are no shortages, or safety concerns, the facility has a process of ensuring that the required number of staff is present or onsite.

The site observation indicated that the lockup has single cell housing. The minimum staffing outlined in the plan is determined based upon the physical layout of the facility. If the facility is full, the plan outlines where the overflow of detainees would be transported. If there ever is an overflow of detainees and the facility is not able to house them appropriately, they are transported to another state/local facilities DOC.

The facility is a temporary holding facility with single-cell housing. If there was a substantiated incident of sexual abuse it would most likely be against an employee, who would be terminated. If there were numerous unsubstantiated incidents, they may determine the need for more supervision at such locations and there would be a constant review of the camera system by the PREA unit.

During the audit site review, the auditor observes adequate staffing levels at the site. The staffing levels for field troopers will vary based on the troops being on site upon the detaining of an individual. When there is a detainee onsite staff are in direct proximity, conducting the processing of the detainee.

Cameras aid in supervising detainees at the facility. They are on the inside and outside area of the facility to help eliminate blind spots and to assist in monitoring detainees. Cameras monitor for site and sound. Additionally, staff must use body cameras during all interactions with detainees and encounters with members of the public.

The arresting officer serves as the direct care staff at the time, unless additional assistance is needed. A staff member is dispatch provides continuous monitoring of the cameras. The cameras have sound and site capabilities. When detainees are in a holding cell and using the restroom, the camera blurs out the area below the waist (automatically). The auditor visits the main control/dispatch room to observe the monitoring and the view of cameras in pointed in the cells.

Informal conversation during the site review with the PREA Coordinator and Facility Commander and a review of the staffing plan confirmed the audio and video systems continuously monitor the detainees' condition and servers to communicate

by two-way radio with detainees and sworn personnel in the cell area. The cell block cameras are equipped with privacy capabilities to protect detainee's privacy. CSP has updated technology to ensure accountability and safety for its personnel and the public. CSP Cruisers are equipped with GPS tracking capabilities. CSP has implemented the use of Body Worn Cameras (BWC) and Mobile Video Recorders (MVR) by its personnel to enhance policing transparency, increase public trust, and to foster police-community relations. These cameras help with the video documentation of all detainee interactions/transport.

**Corrective Actions: None** 

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## 115.113 (b)

The provision requires, in circumstances where the staffing plan is not complied with, the lockup to document and justify all deviations from the plan.

## **Documentary Evidence (Policy, Review of Documents)**

## **Policy:**

Policy: DESPP A&O Section #19.03.30, Revision Dae March 6, 2024, p.6, Number 7, d states each time the staffing plan is not complied with for a particular facility, the commanding officer presiding over that lockup facility shall document and justify all deviations from the staffing plan and shall forward the document with justification to the PREA Coordinator.

## **Review of Documents:**

Online Pre-Audit Questionnaire: Based on a review of the information that the facility provided in the PAQ, each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. The past 12 months was 0.

A review of the staffing plan confirmed that each time the staffing plan is not complied with, the troop commander documents and justifies all deviations from the staffing plan and shall forward the document with justifications to the PREA Coordinator.

The facility did not provide common reasons for deviations from the staffing plan, as there were no deviations from the staffing plan in the previous 12 months.

A review of Policy: DESPP A&O Section #19.03.30, Revision Dae March 6, 2024, p.6, Number 7 includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 4

Facility Commanding Officer reported that all shifts are covered by staff and if no staff is available the supervisor or Lt. would cover the shift.

## Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor had an informal conversation with the PREA Coordinator regarding situations in which a deviation is made from the staffing plan, written justification for such deviation is documented and sent to the PREA coordinator by the facility supervisors.

**Corrective Actions: None** 

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## 115.113 (c)

The provision requires, whenever necessary, but no less frequently than once each year, the lockup to assess, determine, and document whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section: Prevailing staffing patterns: The lockup's deployment of video monitoring systems and other monitoring technologies, and

The resources the lockup has available to commit to ensure adequate staffing levels.

## **Documentary Evidence (Policy, Review of Documents)**

## **Policy:**

Policy requires an internal audit of the staffing plan to be conducted on an annual basis. This assessment is an extensive review of all areas of the facility to ensure adequate staffing levels exist where detainees may be present. Justification for the need for additional staff or modifications to the facility, to include the deployment of video monitoring equipment, will be addressed on an annual basis.

## **Review of Documents:**

Online Pre-Audit Questionnaire: At least once every year the facility reviews the staffing plan to see whether adjustments are needed in the staffing plan; the prevailing staffing patterns; the deployment of monitoring technology; and the allocation of the lockup's resources to commit to the staffing plan to ensure compliance with the staffing plan.

According to a review of the staffing plan, the troop commander is responsible for yearly review of and, if necessary, adjustments to the Troop's PREA staffing plan. The troop commander determines and documents whether adjustments are needed

to the staffing plan no less than once a year. The agency's PREA coordinator is a part of the staffing plan review.

The annual review of the staffing plan includes facility and department management level staff, such as the PC and other institutional Executive staff.

The auditor reviewed shift rosters for respective shifts and was able to verify that an assigned staff member covered every mandatory post.

## Interviews: PREA Coordinator - Q:6

PREA Coordinator (previously interviewed) reported that the staffing plan for this facility is reviewed at least every year, she is consulted regarding any necessary adjustments. The agency has a command meeting to discuss a review of each staffing plan. At the meeting, PREA is discussing potential adjustments.

# Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the facility site review, the observed respective shift, auditor was able to verify that an assigned staff member was present.

## **Corrective Actions: None**

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## 115.113 (d)

The provision requires, if vulnerable detainees are identified pursuant to the screening required by 115.141, security staff to provide such detainees with heightened protection, to include continuous direct sight and sound supervision, single-cell housing, or placement in a cell actively monitored on video by a staff member sufficiently intervene, unless no such option is determined to be feasible.

## **Documentary Evidence (Policy, Review of Documents)**

## **Policy:**

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E: All detainees shall be screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees. 1.2. Troopers and police officers shall ask the detainee about his or her own perception of vulnerability; and the following criteria shall also be considered, to the extent that the information is available: a,b,c,d,e, whether the detainee has a mental, physical, or developmental disability. The age of the detainee, the physical build and appearance of the detainee. Whether the detainee has previously been incarcerated. The nature of the detainee's alleged offense and criminal history.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5, Section E: If after a risk assessment screening, as outlined in section E2 above, any trooper or police officer determines that a detainee is identified as a vulnerable detainee, the trooper or police officer shall provide such detainee with heightened protection. Unless no such measure is determined to be feasible after consultation with the duty supervisor, such protection measure shall include (in order of preference): 1.2.3. Single-cell housing; Continuous direct sight and sound supervision; or Placement in a cell actively monitored on video by an employee sufficiently proximately intervening. Such heightened protection measure (s) for the detainee shall continue to be reemployed for the duration of the detainment, and any post-screening transportation) i.e. prisoner transport) provided in a department vehicle or vehicle operated by a police officer under the jurisdiction and direction of the Division of State Police to or from court, a medical facility, a correctional center, or other entity.

## **Review of Documents:**

Online Pre-Audit Questionnaire indicated the facility utilizes a screening process required by 115.141 to identify vulnerable detainees. Vulnerable detainees are provided with heightened protection.

A review of the documents indicated that Troopers and police officers shall ask the detainee about his or her own perception of vulnerability. The following should be considered to the extent that the information is available:

- Whether the detainee has a mental, physical or developmental disability.
- The age of the detainee.
- The build and physical appearance of the detainee.
- · Whether the detainee has been incarcerated before.
- · The nature of the detainee alleged offense and criminal history.

The auditor reviewed 57 samples of the PREA Notice and Screening Forms, these forms cover all detainees the enter into the facility whether they are there for one to 6 hours or whether they stay overnight. The sample confirmed the facility has a process to access detainees for vulnerabilities.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E includes PREA language.

In Addition, review the site review in provision (a).

## Interviews: Security Staff - Q: 1

Security Staff – The interviewed staff reported that if vulnerable staff are identified during screening the actions taken to protect them include keep separated, increase monitoring, go over the PREA information with them, and provide them for community related victim services if needed. Juveniles would always be kept

separate, and they try to separate genders as well.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

**Corrective Actions: None** 

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## **Overall Findings:**

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.114	Juveniles and youthful detainees
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.114 (a)
	The provision requires that juveniles and youthful detainees to be held separately from adult detainees.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E: states that juveniles and youthful detainees (under the age of 18) shall be held separately from adult detainees.
	Review of Documents:
	Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of juveniles/youthful detainees held in the facility was 0.
	A review of the Juvenile Arrest (Resolving Juvenile Matters) – provides police officers

with a number of options when handling incidents involving a child who is accused or had been convicted of coming a crime. A review of Juvenile Arrest (Resolving Juvenile Matters) records of the logbooks confirmed that no juveniles had stayed overnight at the facility.

The auditor reviewed the Detainee List onsite. The logbook, which holds this list, contains records of all juvenile detainees that a Trooper may have contact with over the past year. Juveniles logged are only held for one to two hours before being released to their parents' custody. A sample of the Juvenile Arrest Resolving Juvenile Matter was reviewed.

There are separate logbooks for adults and juveniles.

A review of Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, meet the requirement of the provision.

Interviews: Sheriff, Chief, or Director – Q:8 / Random Sample of Staff – Q: 14 / Juveniles/Youthful Detainees – Q: 1

Facility Commanding Officer articulated the Lockup does infrequently hold juvenile or youthful detainees. When holding juvenile and youthful detainees, they are detained only until a parent or guardian can pick them up. In most instances, juvenile or youthful offenders are turned over to their parents or guardian at the scene of the incident and given summons.

Twelve random troopers were interviewed by the auditor's non-certified support staff. Nine White, Two Asian, and One Hispanic. Eleven males and one female. Troopers stated that juvenile detainees are held separately from adult detainees. It was also reported that they are typically not held in the lock up area but in a room with a trooper until transferred or released.

Juveniles/Youthful Detainees - There were no detainees to interview regarding whether detainees had any contact with adult detainees while at the facility.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor reviewed the location in which juveniles' detainees would be held. Through informal conversations the staff reported that they will only complete processing paperwork of juveniles in the holding center area. If there is an adult detainee onsite, they will place them in separate rooms and close the door. There are three holding cells. The auditor tours the cells. The toilet was flush and working as well as the running water with the sinks.

During the on-site tour, the auditor did not observe any juvenile or youthful detainees. The population during the on-site visit was zero.

Corrective Actions: None

Provision Findings (Compliance Determination)

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

## 115.115 Limits to cross-gender viewing and searches

**Auditor Overall Determination: Meets Standard** 

## **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.115 (a)

The provision requires lockup not to conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E4: Troopers and police officers shall not conduct crossgender strip searches or cross-gender visual body cavity searches (Refer to A&O 19.2.8). Consistent with A&O 19.01.17 (4) d, detainees shall be enabled to shower, perform bodily functions, and change clothing without non-medical employees of the opposite gender viewing the detainee's breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. 1. Employees of the opposite gender of the detainee shall announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

The CALEA policy also states that strip searches shall not be conducted on juveniles unless there is an extenuating emergency circumstance that compels a strip search of a juvenile. Troopers shall seek guidance for their chain of command, and the juvenile prosecutor's office before proceeding, and the procedures listed above in

section 3 are still to be followed.

The CALEA policy regarding body cavity searches (C.G.S. 54-331 (a) section 1. No search for a body cavity, other than the mouth, shall be conducted without a search warrant.

## **Review of Documents:**

Online Pre-Audit Questionnaire: The PAQ indicates that lockup does not conduct cross-gender strip or cross-gender visual body cavity searches of detainees. Further, in the past 12 months, there were 0 cross-gender strip or cross-gender visual body cavity searches of detainees.

A review of Strip Searches (C.G.S. 54-331) CALEA 1.2.6 section 1. No person arrested for a motor vehicle violation, or a misdemeanor shall be strived unless there is a reasonable belief that the individual is concealing a weapon, a controlled substance or contraband. Section 3. Any trooper conducting a strip search shall: obtain written permission from the commissioner or a designee of the commissioner and prepare a report regarding the conduct and results of the search of Form DPS-874-C.

Documentation review determined that there have been no strip search or body cavity searches. Detainees have privacy if it is necessary for them to change clothing. Policy requires Detainees and staff may be subject to pat down searches by the same gender that will be conducted in a manner that avoids force, embarrassment or indignity to the person being searched.

A review of the following Policies: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures; Policy A&O 19.2.8 – Cross-Gender Searches; Policy A&O 19.01.17 (4) d Shower, Perform Bodily Functions, etc. includes PREA language.

A review of the 1,053 online Training with Trooper Names and dates of completing the training, electronically signed completions regarding Policies #19.03.30 and Policy 19.01.17 PREA Training Agency-wide roster confirmed required training.

Interviews: Non-medical staff (Involved in cross-gender strip or visual searches) – 0:1

Detainee Interviews: There were no detainees to interview regarding, are you and other detainees ever naked in full view of male//female staff.

Detainee Interviews: There were no detainees to interview regarding if the detainee has any reason to believe that they were strip-searched for the sole purpose of determining their genital status.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review, the auditor requests that staff explain the intake process.

There is an area designated for processing detainees, who are typically onsite for about one hour for processing. Strip searches will not occur unless there are exigent circumstances. In informal conversations, the staff mentioned that they aim to conduct searches with personnel of the same gender and provide observation when necessary.

During the tour the auditor had an informal conversation with staff that confirmed they are not allowed to conduct cross-gender cavity/strip searches. There was no documentation of searches doing the processing of detainees at the facility.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.115 (b)

The provision requires that the lockup document all cross-gender strip searches and cross-gender visual body cavity searches.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.2.8 – Prison Rape Elimination Act (PREA) Standards and Procedures. Strip Searches and Body Cavity Searches provides guidelines of the strip search procedures and all strip searches be conducted by the same sex as the arrested person.

Review of Documents:

Online Pre-Audit Questionnaire: The facility policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented.

The site does not perform cross-gender strip searches or cross-gender visual body cavity searches. If these were to occur, the agency would require documentation and approval for all such searches. No documents were available for review.

There were no strip searches or cross-gender visual body cavity searches at this facility. No documents available for review.

A review of Policy: DESPP A&O #19.2.8 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.115 (c)

The provision requires the lockup to implement policies and procedures that enable detainees 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. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5, Section E4: Troopers and police officers shall not conduct crossgender strip searches or cross-gender visual body cavity searches (Refer to A&O 19.2.8). Consistent with A&O 19.01.17 (4) d, detainees shall be enabled to shower, perform bodily functions, and change clothing without non-medical employees of the opposite gender viewing the detainee's breast, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. 1. Employees of the opposite gender of the detainee shall announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

## Review of Documents:

The PAQ indicates the lockup implement policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breast, buttocks, or genitalita, except in exigent circumstances or when such viewing is incidental to routine cell checks. Moreover, the lockup requires staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5, Section E4 includes PREA language.

Interviews: Detainee Interview Questionnaire – Q: 1, 2 / Random Sample of Staff – Q: 13

Detainee Interviews: There were no detainees to interview regarding, does male/

female staff announce their presence when entering an area where detainees may be showering, using the toilet, or changing clothing.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers reported that detainees are held in a single person holding cell while being processed and if needed to use restroom a door that separates the processing area, and the holding cells can be closed. Troopers stated they do not normally announce themselves due to the small area and detainees are only in the processing area for a brief period before being transported to another location or released. It was further reported that while there are cameras in the area, the cameras are blocked near the toilet. The auditor was able to verify through onsite testing. The detainee does not take showers in lockup. They are there for a short time.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the facility tour and informal conversation with staff and observation, the facility has implemented policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

Unless it is exigent in circumstances, detainees should not be undressed at the site. There are toilets and sinks with running water in the holding cells. The toilets have direct observation, however it was reported that if placed in a holding cell the facility would try to place the same gender staff to conduct monitoring. The auditor observed the camera set up and spoke to the dispatch team regarding observation of the toilet and cells. Staff reported that the camera will automatically fuzz, waist down, when the camera is near the toilet area. The auditor asked staff to demonstrate the process. Staff showed the auditor all the cells on the monitor.

The auditor had informal conversations with the PREA Coordinator, and the Facility Commanding Officer and a review of the staff plan confirmed when more than one arrestee/detainee is being booked at the same time, all troopers/officers involved in the booking process shall make every effort to house detainees separately in single cell housing to limit interactions between detainees. Detainees of the opposite sex shall be housed separately. If detainees of different genders are in custody, one gender will be transported to the appropriate Department of Corrections of Judicial Marshall holding facility. If the facility is at full capacity with detainees, the duty supervisor will coordinate arrangements for detainee transportation to another facility while maintaining sufficient staff levels.

Corrective Actions: None

Provision Findings (Compliance Determination)

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.115 (d)

The provision requires the lockup not to search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. If the detainee's genital status is unknown, it may be determined during conversations with the detainee, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5, Section E4: Troopers and police officers shall not search or physically examine any a transgender or intersex detainee for the sole purpose of determining the detainee's genital status.

Review of Documents:

Online Pre-Audit Questionnaire: The facility has a policy prohibiting staff from searching or physically examining a transgender or intersex detainee for the sole purpose of determining the detainee's genital status.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5, Section E4 includes PREA language.

Interviews: Random Sample of Staff - Q: 3 / Transgender/Intersex Detainees - Q: 1

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers reported that CT State Police prohibits staff from searching or physically examining a transgender or intersex detainee for the purpose of determining that detainee's genital status.

Transgender/Intersex Detainees: There were no transgender/intersex detainees' onsite during the audit process to interview.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review: The auditor observed the facility critical functions of cross-gender viewing. The auditor observes areas where detainees may be held. The facility is designed to hold detainees overnight and there are no shower areas. The detainees have access to a toilet in a holding cell. The toilets can have direct observation however the cameras blur out near the toilet area. The staff provided the same gender observation as needed.

The auditor observed the facility critical function of cross-gender announcements. It was further determined that cross-gender announcements may not occur as they will deploy the same gender staff in the holding area. The auditor observed where juvenile, female and male detainees can be housed at the site.

The auditor observed the facility critical functions of cross-gender viewing. The auditor viewed the placement and angle of electronic surveillance monitoring in the main control/ dispatched room. The cameras do not show detainees private body parts using the toilet.

The auditor observed the critical function of the physical storage area of any information/documentation collected and maintained as hard copy. The hard copies of the PREA screening are kept in file and maintained in lock file drawer behind a lock Staff office. Files were onsite for the audit process. Onsite/active files are kept in a locked records room.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.115 (e)

The provision requires the agency to train law enforcement staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Documentary Evidence (Policy, Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures states that the department train troopers in how to conduct crossgender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Review of Documents:

Online Pre-Audit Questionnaire: The agency train law enforcement staff in how to conduct searches of transgender and intersex detainees in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Online Pre-Audit Questionnaire: The percent of all law enforcement staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex detainees in a professional and respectful manner,

consistent with security needs was 940.

It is noted that the percentage of all law enforcement staff that received training in the PAQ was 900, however, the number at this facility that received the required training was 40.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

A review of the Training Curriculum (module 6 Handcuffing) provides documentation that troopers received training on cross gender pat down searches of transgender and intersex detainees.

A review of the online PREA training (9 Modules) adopted from the National PREA Resource Center was completed by all staff.

A review of the Staff Training acknowledgements of staff member confirmed troopers received training on cross gender pat down searches of transgender and intersex detainees.

Interviews: Random Sample of Staff - Q: 2

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The training for troopers during the academy included instructions on performing patdown searches for individuals of different genders, including transgender and intersex individual. This training emphasized using the back of the hand, ensuring body camera is recording and if possible, search for person in the front of cruiser to ensure that dash camera is also recording. Troopers reported specifically that crossgender searches should only be conducted if it's not possible to have another trooper of the same gender perform the search. Troopers stated that they have received in the last year they reviewed training on Power DMS regarding searching.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

## 115.116

# Detainees with disabilities and detainees who are limited English proficient

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.116 (a)

The provision requires that the agency to take appropriate steps to ensure that detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with detainees who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency should ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities, including detainees who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in 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.

Documentary Evidence (Policy, Review of Documents)

## Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5-6, Section E6: Detainees with disabilities include detainees who are deaf or hard of hearing, blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities. Troopers and police officers shall take appropriate steps to ensure that detainees with disabilities or detainees with limited English proficiency have an equal opportunity to participate in or benefit from all aspects of the department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps should include:

- When necessary to ensure effective communication with detainees who are deaf or hard of hearing, or who are limited English proficiency, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
- Providing written materials in formats or through methods that ensure effective communication with detainees with disabilities, including detainees who have

intellectual disabilities, limited reading skills, or who are blind or have low vision.

## Review of Documents:

Online Pre-Audit Questionnaire: The agency has established procedures to provide disabled detainees 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.

The agency has documents in Spanish and English. The site utilizes language line services if there is limited English-speaking individual. The auditor reviewed the Information and Support Services Advocacy cards that are given to all detainees. The card has the following services in English and Spanish with contact numbers:

- Office of Victim Services (OVS) 1-800-822-8428
- Court and Custody Status Notification (CT SAVIN) 1-877-846-3428
- Department of Correction Victim Services Unit 1-888-869-7057
- Sexual Assault (The Alliance) 1-888-999-5545
- Elder Abuse 1-888-385-4225
- Child Abuse Care Line 1-800-842-2288
- Office of the Victim Advocate 1-888-771-3126
- Advocacy for Persons with Disabilities (OPA) 1-800-842-7303
- · Immigration Services (USCIS) 1-800-375-5283

A review of the Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

A review of additional Policies: DESPP A&O 19.05.06 Neglected or Abused Children; DESPP A&O 19.03.07 Elderly Persons Aged Sixty (60) Older; DESPP A&O 19.03.25 Intellectual Disability meets the requirements of the provisions.

A review of the Language Line Services Flyer indicated that the contact information instructions. Connecticut State Police: For Translation Services dial (844) 514-0030, when prompted, enter 4-digit code: 7190. When call is completed say: "END OF CALL"

review of the Zero Tolerance Flyer in English and Spanish.

Interviews: Agency Head – Q: 11 / Detainees (with disabilities or who are limited English proficient) – Q: 1, 2, 3

Agency Head Designee (previously interviewed) report that the agency has established procedures to provide detainees with disabilities and detainees who are

limited English proficient 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. The agency will request officers to assist with translation or utilize the language line if needed.

Detainees (with disabilities or who are limited English proficient) – There were no limited English proficient or detainees onsite during the onsite audit process for interviewing.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor informally discussed interpreter services with staff during the onsite tour. Staff use the Language Line for these services. The auditor noted PREA-related information in English and Spanish in the lock-up area.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.116 (b)

The provision requires the agency to 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 detainees who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Documentary Evidence (Policy, Review of Documents)

Policy: Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5-6, Section E6: Detainees with disabilities include detainees who are deaf or hard of hearing, blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities. Troopers and police officers shall take appropriate steps to ensure that detainees with disabilities or detainees with limited English proficiency have an equal opportunity to participate in or benefit from all aspects of the department's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include:

- When necessary to ensure effective communication with detainees who are deaf or hard of hearing, or who are limited English proficiency, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
- · Providing written materials in formats or through methods that ensure effective

communication with detainees with disabilities, including detainees who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has established procedures to provide detainees with limited English proficiency equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse or sexual harassment.

A review of the Staff Training: provided adequate information on how troopers would appropriately engage individual with disabilities and/or limited English proficient.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Detainees (with disabilities or who are limited English proficient) – Q: 1, 2, 3

There were no detainees with disabilities or limited English proficiency present during the onsite audit process for interviewing.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the tour, the auditor confirmed that staff know how to access interpreter services through the language line if needed.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.116 (c)

The provision requires the agency to not rely on detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under 115.164, or the investigation of the detainee's allegations.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 5-6, Section E6: Troopers and police officers shall not rely on other detainees for assistance with interpreting, reading, or similar activities except in

limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under section G of this policy, or the investigation of a detainee's allegations of sexual abuse, sexual harassment, or retaliation.

## **Review of Documents:**

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, in the past 12 months, the number of instance where detainee interpreters, readers, or other types of detainee assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the Detainees 'safety, the performance of first-response duties under 115.264, or the investigation of the detainee 's allegations was zero.

The documentation indicates that the program has not relied on detainee interpreters, detainee readers, or other types of detainee assistants.

All stated they would not use detainees as interpreters. Some troopers are bilingual.

The auditor reviewed the posters in English and Spanish Lock-Up and cell areas.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Random Sample of Staff – Q: 8 / Detainees (with disabilities or who are limited English proficient) – Q: 1, 2, 3

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The interviewed troopers affirmed that they would not rely on another detainee to interpret or assist a disabled or limited English proficiency detainees in reporting any allegations of sexual abuse or harassment. Instead, the troopers stated that arrangements would be made for a staff member to provide interpretation assistance if needed, they would contact the language line, call local police, or dispatch. However, the Troopers indicated that they would not use another detainee to interpreter, reader, or other types of assistants from another detainee.

No detainees with disabilities or limited English proficiency were present for interviews during the audit.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversation with staff indicated that they would not let detainees serve as interpreters. The facility has staff interpreters and if needed they will access the language line.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.117	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.117 (a)
	The provision requires, the agency not to hire or promote anyone who may have contact with detainees and shall not enlist have services of any contractor who may have contact with detainees, 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).
	Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse or has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a) (2) of this section.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: – states that the department does not hire or promote anyone who may have contact with detainees and not enlist the services of any contractor who may have contact with detainees 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). 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. It has been civilly or administratively adjudicated to

have engaged in the activity described in subsection O (1) (b).

Review of Documents:

Online Pre-Audit Questionnaire: The agency policy prohibits hiring or promoting anyone who may have contact with detainees and prohibits enlisting the services of any contractor who may have contact with detainees.

The PAQ also addresses the three questions and indicates the agency prohibits the hiring or promotion of anyone who may have contact with detainees who responds "yes" to any of these three questions.

The auditor reviewed the Background checks and the Hiring/Application Packages. The Background checks documentation package included the following:

- · SPRC (State Police Record Check) System
- FLOQW (Person Query Form)
- FLIQ (NLETS Criminal History Identity) System

A review of the Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, meet the requirement of the provision.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (b)

The provision requires that the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: states that the department shall consider any incidents of sexual harassment in determining whether to hire or promote anyone,

or to enlist the services of any contractor, who may have contact with detainees.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 2

Administrative (Human Resources Previously Interviewed) staff reported that the agency does consider prior incidences of sexual harassment. It was further reported that such considerations are outlined in policy.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (c)

The provision requires before hiring new employees, who may have contact with detainees, the agency shall: Perform a criminal background records check, and Consistent with Federal, State, and local laws, make its best efforts to contact all prior institutional employees for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – states that before hiring new employees who may have contact with detainees, the department shall: (a) (b) Perform a criminal background records check; and 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

**Review of Documents:** 

The PAQ indicates that before hiring new employees who may have contact with the

detainee's the agency:

- Perform a criminal background records check.
- 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.

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, in the past 12 months, the number of people hired who may have contact with Detainees who have had criminal background record checks was 1.

The auditor reviewed samples of the agency conducting criminal background checks at the state and federal level, in addition to conducting motor vehicle checks. The agency runs SPRC (State police record check), FLIQ (NLETS Criminal History Identity, and FLQW (person query form).

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 1

Administration (Human resources Staff Previously Interviewed) reported that the agency conducts criminal background checks at the state and federal level, in addition to conducting motor vehicle checks. The agency runs SPRC (State police record check), FLIQ (NLETS Criminal History Identity, and FLQW (person query form).

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (d)

The provision requires the agency to perform a criminal background record check before enlisting the services of any contractor who may have contact with detainees.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and

Procedures. Page 15-16, Section O: states that the department also performs a criminal background record check before enlisting the services of any contractor who may have contact with detainees.

**Review of Documents:** 

The PAQ indicates the agency performs a criminal background records check before enlisting the service of any contractor who may have contact with detainees.

Online Pre-Audit Questionnaire: Based on a review of information about the facility provided in the PAQ, in the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with Detainees was zero.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 1

Administration (Human Resources Staff Previously Interviewed) reported that the agency conducts criminal background checks at the state and federal level, in addition to conducting motor vehicle checks. The agency runs SPRC (State Police Record Checks), FLIQ (NLETS Criminal History Identity, and FLQW query form).

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (e)

The agency requires either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: – states that the department shall either conduct criminal background record checks at least every five (5) years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees.

Review of Documents:

Online PREA Audit Questionnaire: Before hiring new employees, who may have contact with detainees, the agency performs a criminal background records check.

The agency conducts 5-year background checks on the entire troop. All staff had a refresher background check run on them during the audit phase.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 3

Administrative (Human Resources Staff Previously Interviewed) reported that every employee at the agency is required to complete a successful background check prior to being employed officially by the agency. In 2024 the agency will run all CSP and constables. All personnel will be running again in five years. The agency conducts law enforcement background checks on all state troopers.

Through the interview process it was also confirmed that all employees of the lockup had criminal background records checked in April 2024.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (f)

The provision requires the agency to ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: states that the department asks all applicants and employees who may have contact with detainees directly about previous misconduct described in subsection O (1) above in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted

as part of reviews of current employees. All employees who may have contact with detainees shall have a continuing affirmative duty to disclose any misconduct described in subsection O (1).

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency asks all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 4, 5

Administrative (Human Resources Staff Previously Interviewed) reported that new hires and staff considered for promotion in the detainee areas must complete a PREA Employment Questionnaire. It was further reported that law enforcement officers are subjected to a polygraph examination and policy outlines the duty to disclose any arrests, not only for sexual misconduct.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (g)

The provision requires material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: Material omissions regarding such misconduct described in this section, or the provision of materially false information, shall be grounds for termination.

Review of Documents:

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.117 (h)

The provision requires unless prohibited by law, the agency to 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 employed has applied to work.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O: states that unless prohibited by law, the department provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for who such employee has applied to work.

Review of Documents:

Online Pre-Audit Questionnaire: indicated unless prohibited by law, the agency provides 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.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section O includes PREA language.

Interviews: Administrative (Human Resources) Staff - Q: 6

Administrative (Human Resources Staff Previously Interviewed) reported that the agency does disclose sexual abuse or sexual harassment information to other institutional employers about former employees, upon request from that institution. The legal affairs unit will work with HR on said requests.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## **Overall Findings:**

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

## 115.118 Upgrades to facilities and technologies

**Auditor Overall Determination: Meets Standard** 

## **Auditor Discussion**

## **Reasoning and Analysis (By Provisions):**

## 115.118 (a)

The provision requires, when designing or acquiring and new lockup and in planning any substantial expansion or modification of existing lockups, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect detainees from sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency when designing or acquiring and new lockup and in planning or modification of existing lockup the agency consider the impact of sexual abuse and sexual harassment in its planning.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Agency Head - Q: 1 / Sheriff, Chief, or Director - Q: 5

Agency Head Designee (previously interviewed) reports that when designing, acquiring, or planning substantial modifications to facilities, the agency considers the effects of such changes on its ability to protect detainees from sexual abuse. CSP has not made any recent modifications to facilities. If the agency were to make

changes, they would follow PREA and CALEA guidelines.

The Facility Commander reported that there have been no expansions or modifications except replacing computer equipment. It was also acknowledged that part of the renovation or modification process would be to consult the PREA standards and obtain the input of the PREA Coordinator.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review and informal conversations with staff there was no information that indicated that the site had made any expansions or modifications.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.118 (b)

The provision requires, when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect detainees from sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: The PAQ indicates the agency has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology.

Interviews: Agency Head - Q: 1 / Sheriff, Chief, or Director - Q: 5

Agency Head Designee (previously interviewed) reports that the agency uses monitoring technology (either newly installed or updated) to enhance the protection of detainees from incidents of sexual abuse. The agency considers the effect of such changes on the ability to protect detainees from sexual abuse. The agency continuously monitors all detainees via camera (visual and audio).

Facility Commanding Officer reported that security cameras within the cell blocks/ processing area are always recorded, and the cameras are pixelated to maintain privacy of the genital area if detainees use the toilet.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews):

During the onsite portion of the audit, the auditor checked the monitoring system. The monitoring system is in the dispatch area. The office is utilized to watch cameras and make announcements; along with other duties/responsibilities of staff.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

## 115.121 Evidence protocol and forensic medical examinations

**Auditor Overall Determination: Meets Standard** 

**Auditor Discussion** 

## Reasoning and Analysis (By Provisions):

115.121 (a)

The provision requires to the extent the agency is responsible for investigating allegations of sexual abuse in its lockups, the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 6 Section H: 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. 1. When conducting investigations into all allegations of sexual abuse within a department lockup, troopers and police officers shall follow uniform evidence protocol that maximizes the potential for

obtaining usable physical evidence. Refer to A&O 18.2.7 for additional details. Crime Scene Evidence policy provides a detailed description on the protocol on the handing of crime scene (p.22-23).

Review of Documents: None

Online Pre-Audit Questionnaire: The agency/facility is responsible for conducting administrative sexual abuse investigations (including detainee-on-detainee sexual abuse or staff sexual misconduct). The agency/facility is responsible for conducting criminal sexual abuse investigations (including detainee-on-detainee sexual abuse or staff sexual misconduct).

A review of the Calea 18.2.7 Evidence Collection Methods indicated the following Topics: Blood Evidence; Handle Garments Carefully, Semen's Stains and Body Fluids, Collection of Saliva Samples and Other body fluids.

A review of the Connecticut State Police Major Crime Juvenile Sexual Assault Protocol some of the areas included:

- Purpose of this Protocol
- · Upon arrival at the scene the investigating Trooper can make contact with the victim and make the appropriate arrangements for medical care, note if the victim has any special needs, disabilities or requests.
- Gather the minimal facts of the incident to get the basic information of the alleged offense.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Random Sample of Staff - Q: 9, 11

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers were aware of the agency's protocols. Troopers were able to describe the process and steps required to obtain usable physical evidence to include separating the detainees in custody, using body camera to record scenes, securing the area, bagging clothes in certain bags, notifying the supervisor and transporting for medical services. The troopers stated that supervisor or major crime unit would conduct sexual abuse investigations.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and

informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.121 (b)

The provision requires agency protocol to be developmentally appropriate for youth where applicable, and as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office of Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011. As part of the training required in 115.131, employees and volunteers who may have contact with lockup detainees shall receive basic training regarding how to detect and respond to victims of sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15, Section N: The department shall train all troopers and any other employee or volunteer who may have contact with lockup detainees to fulfill their responsibilities under the department's sexual abuse prevention, detection, and response policies and procedures, including training on: (a) (b) (c) (d) (e) (f).

**Review of Documents:** 

Online Pre-Audit Questionnaire: Employees and volunteers who may have contact with detainees receive basic training regarding how to detect and respond to victims of sexual abuse.

A review of the Connecticut State Police Major Crime Juvenile Sexual Assault Protocol some of the areas included:

- Purpose of this Protocol
- · Upon arrival at the scene the investigating Trooper can make contact with the victim and make the appropriate arrangements for medical care, note if the victim has any special needs, disabilities or requests.
- $\cdot$  Gather the minimal facts of the incident to get the basic information of the alleged offense.

The documentation indicates the Juvenile Arrest Procedures provides guidance on the uniform evidence protocol while working with youth and is documented in the Juvenile Arrest logbook.

Interviews: Random Sample Staff - Q:1

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The

troopers affirmed that they received PREA education as part of the academy training as well as they have regular training in Power DMS system, Roll Call briefings will discussed updates and handouts are given out by supervisors to cover clear understanding of the Zero Tolerance Policy, the rights of both employees and detainee in custody, recognizing signs and symptoms of sexual abuse, and the procedures for reporting and responding to such incidents. Furthermore, the troopers were able to articulate the appropriate actions to prevent, detect, report, and respond to instances of sexual abuse and harassment including recognizing if they notice physical harm, sadness, shame or isolation. The troopers could articulate ways to avoid inappropriate relationships with detainees as well as ensuring they comply under mandated reporting laws.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversations with staff during the site visit confirmed that the Juvenile Arrest Procedures provide guidance on the unform evidence protocol while working with youth.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.121 (c)

The provision requires the agency to 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. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9-10, Section H: When a sexual abuse allegation is made, a forensic medical examination shall be offered to all victims, without financial cost, when evidentiary or medically appropriate. 1. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs), where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. Efforts to provide SAFEs or SANEs shall be documented in the investigator's report. If a detainee is transported for a forensic examination to a medical facility that offers victim advocacy services, the detainee shall be permitted

to use such services to the extent available, consistent with security needs. When a sexual abuse allegation is made by a juvenile detainee, investigators shall ensure that developmentally appropriate protocols are implemented (e.g., Child Advocacy Center interviews, etc.).

**Review of Documents:** 

PAQ: The facility offers all detainees who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim.

Online Pre-Audit Questionnaire: The number of forensic medical exams conducted during the past 12 months was 0. The number of exams performed by SANEs/SAFEs during the past 12 months was 0. The number of exams performed by a qualified medical practitioner during the past 12 months was 0.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9-10, Section H includes PREA language.

Interviews: None

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.121 (d)

The provision requires, if the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, the detainee shall be permitted to use such services to the extent available, consistent with security needs.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9-10, Section H: When a sexual abuse allegation is made, a forensic medical examination shall be offered to all victims, without financial cost, when evidentiary or medically appropriate. 1. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs), where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. Efforts to provide SAFEs or SANEs shall be documented in the investigator's report. If a detainee is transported for a forensic examination to a

medical facility that offers victim advocacy services, the detainee shall be permitted to use such services to the extent available, consistent with security needs. When a sexual abuse allegation is made by a juvenile detainee, investigators shall ensure that developmentally appropriate protocols are implemented (e.g., Child Advocacy Center interviews, etc.).

#### Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, in the past 12 months, the number of detainees transported to outside hospital for forensic examination was 0. In the past 12 months, the number of detainees transported to outside hospital for forensic examination who were offered victim advocacy services was 0.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9-10, Section H includes PREA language.

The PREA Coordinator confirmed that any sexual abuse in the facility would result in transporting to an outside hospital for forensic examinations.

The auditor reviewed the Connecticut Alliance to End Sexual Violence (Support, Advocate, Prevent) website on April 3, 2025. This is a statewide agency that operates has nine (9) alliances. The Alliance's nine member centers have provided free and confidential services to children, adolescents, and adult victims of sexual violence throughout Connecticut. Survivors can access services 24/7/365 via phone or at their local center. Each center offers counseling; support groups; accompaniments in hospital, police, and court settings; case management and support while navigating complex systems post-disclosure; and a myriad of other trauma-informed services that support healing, connection, and justice.

These services are available to all survivors in Connecticut – regardless of age, sex, immigration status, race, ethnicity, nationality, sexual orientation, gender identity or expression, or religious or spiritual beliefs. There is a 24-Hour, Toll-Free Hotlines: 1-888-999-5545 (English) and 1-888-568-8332 (Espanol).

On April 3, 2025, at 10:18 a.m., the auditor called Connecticut Alliance to End Sexual Violence (1-888-999-5545) to test the process. A male staff member answered and explained that if no one picks up the main office number, the call rolls over to the next available center. If it's outside their region, they forward the call based on the Connecticut Zip code. Calls are private and confidential, and each of the nine centers has a local hotline number posted.

On April 3, 2025, at 10:43am, the auditor contacted the Connecticut Alliance to End Sexual Violence Spanish hotline (1-888-568-8332) to test the process. A male staff member answered the call and explained that if the caller were female, he would inform his supervisor. The call would then be forwarded to the appropriate center in the relevant region.

The review of the Zero Tolerance for Detainee Sexual Abuse and Sexual Harassment

Section title "Victim Support Services" has the following information: The Connecticut State Police has partnered with the Connecticut Alliance to End Sexual Violence to provide survivors of sexual abuse with emotional support services. To access these services, contact 888-999-5545 or send a letter to: Connecticut Alliance to End Sexual Violence at 96 Pitkin St., East Hartford, CT 06108.

The agency has documents in Spanish and English. The site utilizes language line services if there is limited English-speaking individual. The auditor reviewed the Information and Support Services Advocacy cards that are given to all detainees. The card has the following services in English and Spanish for emotional support services with contact numbers:

- Office of Victim Services (OVS) 1-800-822-8428
- Court and Custody Status Notification (CT SAVIN) 1-877-846-3428
- Department of Correction Victim Services Unit 1-888-869-7057
- Sexual Assault (The Alliance) 1-888-999-5545
- · Elder Abuse 1-888-385-4225
- Child Abuse Care Line 1-800-842-2288
- Office of the Victim Advocate 1-888-771-3126
- Advocacy for Persons with Disabilities (OPA) 1-800-842-7303
- · Immigration Services (USCIS) 1-800-375-5283

Interviews: PREA Coordinator - Q: 9

PREA coordinator (previously interviewed) reported that victims of sexual abuse are transported for a forensic examination to an outside hospital to receive a forensic examination. The agency does not have medical staff that complete any of these services, so all medical services are always completed by a local hospital. The hospital offers victim advocacy services, and the agency also provides the victim with a victim advocacy card to continue to receive services in case they are released from the hospital and/or agency custody. Victims are also encouraged to continue to use advocacy services. There may be limitations if transported to DOC, however, DOC has onsite services.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the facility onsite review, the auditor observed the Zero Tolerance for Detainee Sexual Abuse and Sexual Harassment post with Victim Support Services and there was a phone available for detainee to make a call.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.121 (e)

The provision requires that to the extent that the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online PREA-Audit Questionnaire: The agency is responsible for conducting any form of criminal or administrative sexual abuse investigations. N/A.

Interviews: None

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.121 (f)

The provision requires that the requirements in paragraphs (a) through (e) of this section shall also apply to:

- Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in lockups; and
- Any Department of Justice component that is responsible for investigating allegations of sexual abuse in lockups.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: Auditor is not required to audit this provision.

Interviews: None

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

Auditor is not required to audit this provision.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.122 Policies to ensure referrals of allegations for investigations

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.122 (a)

The provision requires, that the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H: DESPP shall ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Review of Documents:

The PAQ indicates the agency ensure all administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment.

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, in the past 12 months, the number of allegations of sexual

abuse and sexual harassment that were received was 0. In the past 12 months, the number of allegations resulting in an administrative investigation was 0. In the past 12 months, the number of allegations referred to for criminal investigation was 0.

The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse or staff sexual misconduct). There were zero PREA investigation cases to review.

The auditor's review of the PREA investigations process shows that the following information is captured in the reports:

- Investigation Report (DPS-683-E) Revised 2/3/06.
- · Report Type: Initial Report Prosectors Report Supplement: Re-open; Assist; or closing.
- · Attachments: Teletype Photos Sketch map Evidence Others
- · Incident Date Time Primary Officer Badge Number
- · Investigating Officer Badge Number
- Incident Address
- Status Code: C-Complainant / V-Victim / A-Arrestee / J-Juvenile / H- Other / M-Missing / W-Witness /O- Offender/Accused / T-TOT
- · Incident Date/Time: Original Case: / PREA Compliant
- Name of Subject (Sex, Race, Height, Weight
- · Involved Officer (s)
- · Name (s) of Witness (es)
- Medical Assistance Provided: Medical Note
- Narrative
- Arrested/Processing
- BWC/Dashcam
- Conclusion/Findings
- Attachments: Incident Report /Form (DPS-683-E) / Witness Statement Form (DPS-633-C) / Criminal Press Summary (DPS-90-C) / PREA Notice and Screening Form (DESPP-0103-C) / CAD Remarks
- Collect/NICI
- · Case Status

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

- PREA Investigation Findings by Facility August 1, 2023 December 31, 2023. The 2023 Summary: The Connecticut State Police implemented the PREA Policy on July 21, 2023. During the reporting period, from August 1, 2023, to December 31, 2023, there were no reported PREA-related allegations across any of the 11 Connecticut State Police Troops. This includes incidents involving detainee-on-detainee interactions, as well as those involving sworn and civilian DESPP personnel, and constables under the supervision of the Resident State Trooper program.
- PREA Investigation Findings by Facility January 1, 2024 December 31, 2024. The 2024 Summary: During the reporting period from January 1, 2024, to December 31, 2024, three PREA related allegations were reported. Two PREA allegations were reported as staff on detainee sexual misconduct and one was reported as staff on detainee sexual harassment. All three were investigated by specialized investigators and were determined to be unfounded.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Agency Head - Q: 3, 4

Agency Head Designee (previously interviewed) reported that administrative and criminal allegations are investigated by the agency. A call for service is generated and the appropriate investigator is assigned. The PREA Policy is followed.

Agency Head Designee (previously interviewed) report that the agency ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment.

Agency Head Designee (previously interviewed) describe how an administrative or criminal investigation is completed for allegations of sexual abuse or harassment. A call for service is generated and the appropriate investigator is assigned. The PREA policy is followed.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.122 (b)

The provision requires, if another law enforcement agency is responsible for conducting investigations of allegations of sexual abuse or sexual harassment in its lockups, the agency shall have in place a policy to ensure that such allegations are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency shall publish such a policy, including a description of responsibilities of both the agency and the investigating entity, on its website, or if it does not have one, make the policy available through other means. The agency shall document all such referrals.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: The agency is responsible for conducting administrative and criminal investigations of sexual abuse and sexual harassment. NA.

Policy on website: Home (ct.gov): Agency policy on the investigation process can be located on the agency website. The auditor reviews the policy on the Agency website.

Interviews: Investigative Staff - Q: 4

Investigative Staff (previously interviewed) reported that the agency policy requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations. The investigative staff confirmed the agency/facility is responsible for investigating every allegation, whether it is administrative or criminal.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.122 (c)

The provision requires any state entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in lockups shall have in place a policy governing the conduct of such investigations.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: Auditor is not required to audit this provision.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

Auditor is not required to audit this provision.

115.122 (d)

The provision requires, that any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in lockups shall have in place a policy governing the conduct of such investigations.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: Auditor is not required to audit this provision.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

Auditor is not required to audit this provision.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.131 Employee and volunteer training

**Auditor Overall Determination: Meets Standard** 

## **Auditor Discussion**

# Reasoning and Analysis (By Provisions):

## 115.131 (a)

The provision requires the agency to train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under the agency sexual abuse prevention, detection, and response policies and procedures, including training on:

- The agency's zero tolerance policy and detainees' right to be free from sexual abuse and sexual harassment.
- The dynamics of sexual abuse and harassment in confinement settings, including which detainees are most vulnerable in lockup settings.
- The right of detainees and employees to be free from retaliation for reporting sexual abuse or harassment.
- · How to detect and respond to signs of threatened and actual abuse.
- · How to communicate effectively and professionally with all detainees; and
- · How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

Documentary Evidence (Policy, Review of Documents)

## Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section N: The department shall train all troopers and any other employee or volunteer who may have contact with lockup detainees to fulfill their responsibilities under the department's sexual abuse prevention, detection, and response policies and procedures, including training on: (a) (b) (c) (d) (e) (f). The department's zero-tolerance policy and detainees' right to be free from sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement settings, including which detainees are most vulnerable in lockup settings; The right of detainees and employees to be free from retaliation for reporting sexual abuse or sexual harassment; How to detect and respond to signs of threatened and actual sexual abuse; How to communicate effectively and professionally w with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency trains all employees and volunteers who may have contact with detainees on the required topics.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

A review of the online PREA training (9 Modules) adopted from the National PREA Resource Center was completed by all staff.

A review of the Staff Training acknowledgements of staff member confirmed troopers received training on cross gender pat down searches of transgender and intersex detainees.

A review of the 1,053 online Training with Trooper Names and dates of completing the training, electronically signed completions regarding Policies #19.03.30 and Policy 19.01.17 PREA Training Agency-wide roster confirmed required training.

A review of the Employee PREA Training Acknowledgement for New Hire and Refresher-Acknowledge is completed electronically in the training management system.

Interviews: Random Sample of Staff – Q:1 / Volunteers (who may have contact with detainees) – Q:1

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers affirmed that they received PREA education as part of the academy training as well as they have regular training in Power DMS system, Roll Call briefings will discussed updates and handouts are given out by supervisors to cover clear understanding of the Zero Tolerance Policy, the rights of both employees and detainee in custody, recognizing signs and symptoms of sexual abuse, and the procedures for reporting and responding to such incidents. Furthermore, the troopers were able to articulate the appropriate actions to prevent, detect, report, and respond to instances of sexual abuse and harassment including recognizing if they notice physical harm, sadness, shame or isolation. The troopers could articulate ways to avoid inappropriate relationships with detainees as well as ensuring they comply under mandated reporting laws.

No volunteers were available for interviews concerning their receipt of PREA training. It is also noted that the facility does not have or use volunteers.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and

informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.131 (b)

The provision requires that all current employees and volunteers who may have contact with lockup detainees to be trained within one year of the effective date of the PREA standards, and the agency shall provide annual refresher information to all such employees and volunteers to ensure that they know the agency's current sexual abuse and sexual harassment policies and procedures.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states that all existing employees who may have contact with lockup detainees be trained within one year of the effective date of the PREA standards and provide refresher information annually to ensure that employees know the department's current detainee sexual abuse and sexual harassment policies and procedures.

Review of Documents:

Online Pre-Audit Questionnaire: All current employees and volunteers who may have contact with detainees with detainees received PREA training.

The frequency with which employees and volunteers who may have contact with detainees receive refresher training on PREA requirements is through In-Service Training.

A review of the PREA Training Log confirmed completion of the required training.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: None

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.131 (c)

The provision requires the agency to document, through employee signature or electronic verification, that employees understand the training they have received.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section N: All troopers and other employees who may have contact with lockup detainees shall acknowledge either in written or electronic format as designated by the department, that he or show understands the training/refresher information they have received. (a) the department shall maintain documentation confirming that such training/refresher information has been received, and such records shall be received, and such records shall be made available to the PREA coordinator.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency documents, through employees' signature or electronic verification, that employees understand the training they have received.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15-16, Section N: meets the requirement of the provision.

The New Hire Staff PREA Understanding Acknowledgement signed electronically by staff confirmed completion of the training. A review of the PREA Training Log provided verification of the staff training.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# agency's zero-tolerance policy

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.132 (a)

The provision requires that the intake process, employees to notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment.

Documentary Evidence (Policy, Review of Documents)

# Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E: During the initial intake of a detainee into a department lockup facility, the processing trooper or police officer shall read to all detainees the PREA Notification which notices all detainees of the following: 1. The department's zero-tolerance policy for all forms of detainee sexual abuse and sexual harassment.

#### Review of Documents:

Online Pre-Audit questionnaire: Based on a review of information the facility provided in the PAQ, of detainees admitted during the past 12 months, the number of those who were given this information at intake was 0.

It is noted that the facility did not admit any detainees that stay overnight, however the facility completes a PREA screening on all detainees whether they are there for one hour or if they stayed overnight.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Intake Staff - Q:1 / Detainee Interview Questionnaire - Q: 3

Intake Staff (Trooper) reported that detainees are provided with a sheet at intake on PREA. The information is provided when conducted with the risk assessment and it is also on the Prison Property Form. Further information is posted on the wall in the lock up area. When detainees come into the processing area the documentation is immediately covered. The troopers verbally go over the forms with the detainees.

Detainee Interviews: There were no detainees to interview regarding, are you and other detainees ever naked in full view of male//female staff.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review, the auditor learned that all troopers are trained to conduct intake. Troopers process detainees immediately upon arrival at the facility, typically keeping them onsite for one - two hours. The auditor noted PREA-related documentation both written and on walls near the holding area.

Troopers will read the material with the detainee during informal conversation. They also provide a pocket card with victim-related services. The auditor reviewed the logbook, noting separate entries for juveniles while the adult.

During Intake, employees inform detainees of the zero-tolerance policy on sexual abuse and harassment.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.132 (b)

The provision requires the agency to ensure that, upon entering the lockup, contractors and any inmates who work in the lockup are informed of the agency's zero tolerance policy regarding sexual abuse and sexual harassment.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15, Section N: states that any contractor or (DOC) inmates assigned to work in the lockup and who may have contact with lockup detainees be informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment.

Review of Documents:

The PAQ indicates during the intake process, employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment.

Online Pre-Audit Questionnaire: Contractors and any inmates who work in the facility are informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment upon entering the facility is all.

It is noted that the facility does not use inmate labor.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15, Section N includes PREA language.

Interviews: Contractor (s) and Inmates who work in the Lockup (who may have

contact with detainees - Q: 1

Contractor (s) and Inmates who work in the Lockup (who may have contact with Detainees), there are no contractors or inmates who work in the lockup who may have contact with Detainees during the audit process.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.134 Specialized training: Investigations

**Auditor Overall Determination: Meets Standard** 

## **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.134 (a)

The provision requires that in addition to the general training provided to all employees and volunteers pursuant to 115.131, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15, Section N: In addition to the general training requirements listed above, the department shall ensure that department investigators that conduct detainee sexual abuse investigations have received training in conducting such investigations in confinement settings. (a) Specialized training shall include: 1.

2. 3. Techniques for interviewing sexual abuse victims; Proper use of Miranda and Garrity warnings; Sexual abuse evidence collection in confinement setting; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

#### **Review of Documents:**

Online Pre-Audit Questionnaire: The agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

The auditor confirmed that investigators take the Specialized Training for Investigators from the PREA Resource Center Specialized Training: Investigating Sexual Abuse in Confinement Setting (9 modules). The auditor reviewed nine modules and covered the following topics:

- Module 1: PREA Update and Overview of PREA
- Module 2: Legal Issues and Agency Liability: What Investigators Should Know
- Module 3: Investigations and Agency Culture
- Module 4: Trauma and Victim Response: Considerations for The Investigative Process
- Module 5: Role of Medical and Mental Health Practitioners in Investigations
- Module 6: First Response and Evidence Collection: The Foundation for Successful Investigations
- Module 7: Interviewing Techniques: Skills that Address the Dynamics of Sexual Abuse
- Module 8: Report Writing
- Module 9: Prosecutorial Collaboration

The auditor reviews 20 of the PREA Specialized Training: Investigating Sexual Abuse in Confinement Setting Certification Sheet that investigators signed, and date acknowledge that they completed the required training.

A review of the Specialized Training for Investigators confirmed that all Troopers are investigators have received specialized training to investigate allegations of sexual abuse in a confinement setting. It should be noted that all troopers are law enforcement personnel.

The auditor reviewed 1,053 online Training with Trooper Names and dates of completing the training, electronically signed completions regarding Policies #19.03.30 and Policy 19.01.17 PREA Training Agency-wide roster confirmed of Troopers completing the required training.

A review of Policy Department of Emergency Services and Public Protection (DESPP)

A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Investigative Staff - Q: 2, 3

The Investigative Staff (previously interviewed) stated that they have completed training specific to conducting sexual abuse investigations. The training included a wide array of topics from the language that should be used, interview techniques, statistics, application of Miranda and Garrity warnings, the culture of inmates (i.e. code of silence), understanding/ recognizing trauma responses in victims, an overview of forensic examinations, evidence collection procedure specific to confinement, different techniques used to interview adults versus juveniles, and finally the outcome following the investigation/report. What will qualify for administrative versus criminal prosecution.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.134 (b)

The provision requires specialized training to include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section # 19.03.30, Revision Date March 6, 2024, p 15, N, 6, a, 1-3, states specialized investigator training shall include:

- Techniques for interviewing sexual abuse victims.
- Proper use of Miranda and Garrity warnings.
- Sexual abuse evidence collection in confinement settings

Review of Documents:

Online Pre-Audit Questionnaire: Specialized training includes Techniques for interviewing sexual abuse victims.

The agency specialized training does include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

A review of the PREA Resource Center Specialized Training: Investigating Sexual Abuse in Confinement Settings (9 modules) confirmed that the investigative staff have received the required information.

The auditor reviews 20 of the PREA Specialized Training: Investigating Sexual Abuse in Confinement Setting Certification Sheet confirmed that all Troopers are investigators, and they have received specialized training to investigate allegations of sexual abuse in confinement settings. The investigator signed, and date acknowledging that they completed the required training.

Policy: DESPP A&O Manual, Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Investigative Staff - Q: 3

Interviewed investigative staff stated that the topics included in the training were: techniques for interviewing sexual abuse victims, Miranda and Garrity warnings, sexual abuse evidence collection, and criteria to substantiate a case.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.134 (c)

The provision requires the agency to maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

The PAQ indicates that the agency maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The investigators completed the PREA Resource Center Specialized Training: Investigating Sexual Abused in Confinement Settings.

Online Pre-Audit Questionnaire: Based on a review of information about the facility provided in the PAQ, the number of investigators currently employed who have completed the required training was 150.

It is noted that the facility has 40 Troopers training as investigators.

A review of the PREA Resource Center Specialized Training: Investigating Sexual Abuse in Confinement Settings (9 modules) confirmed that the investigative staff have received the required information.

The auditor reviews 20 of the PREA Specialized Training: Investigating Sexual Abuse in Confinement Setting Certification Sheet confirmed that all Troopers are investigators, and they have received specialized training to investigate allegations of sexual abuse in confinement settings. The investigator signed, and date acknowledging that they completed the required training.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.134 (d)

The provision requires any State entity or Department of Justice component that investigates sexual abuse in lockups to provide such training to their agents and investigators who conduct such investigations.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: Auditor is not required to audit this provision.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

Auditor is not required to audit this provision.

Overall Findings:

The auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewing staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.141 Screening for risk of victimization and abusiveness Auditor Overall Determination: Meets Standard **Auditor Discussion** Reasoning and Analysis (By Provisions): 115.141 (a) The provision requires lockups that are not utilized to house detainees overnight. Before placing any detainees together in a holding cell, staff shall consider whether, based on the information before them, a detainee may be at high risk of being sexually abused and, when appropriate, shall take necessary steps to mitigate any such danger to the detainee. Documentary Evidence (Policy, Review of Documents) Policy: Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 15, Section N: In lockups that are not utilized to house detainees overnight, before placing any detainees together in a holding cell, troopers and police officers consider whether, based on the information before them, a detainee may be at a high risk of being sexually abused, and when appropriate, take necessary steps to mitigate any danger to the detainee. The same considerations are applied to lockups in which a detainee is never placed in a holding cell with another detainee and is never placed in an area with other detainees absent continuous staff supervision.

**Review of Documents:** 

The PAQ indicates the facility is used to house detainees overnight.

Online Pre-Audit Questionnaire: The agency/facility is used to house detainees overnight. Before placing any detainees together in a holding cell, staff consider whether a detainee may be at a high risk of being sexually abused. When appropriate, staff take the necessary steps to mitigate any such danger to the

detainee.

A review of the PREA Notice and Screening Form indicated that all detainees entered into the facility receive or complete an PREA assessment.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Staff who Perform Screening for Risk of Victimization – Q: 1 / Random Sample of Staff – Q: 15, 16

Interviewed Staff Who Perform Screening for Risk of Victimization (Trooper) reported that detainees are interviewed for risk of sexual abuse victimization. The tool is new to the agency. However, the screening tool looks at if the detainee feels that they are at risk of being abused, if they have been abused, and whether they feel safe. The screening is conducted by any arresting officer who transports the detainee to the lock up site.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. Staff reported that detainees are held in a single person holding cell. The troopers stated that if they determine a detainee a detainee is at high risk of sexual abuse, they will share this information with their supervisor, ensure they are separated from other detainees and notify the next facility, such as the jail, where the detainee is being transferred.

Detainee Interviews: There were no detainees to interview regarding when detainee arrived at this facility dealing with their safety.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The facility is a lockup where some individuals are not placed in a holding cell with others. However, the facility screens all individuals upon entry. Those who may stay overnight undergo PREA screening as well.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.141 (b)

The provision requires, in lockups that are utilized to house detainees overnight, all detainees shall be screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees.

Documentary Evidence (Policy, Review of Documents)

# Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E: All detainees shall be screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees.

#### Review of Documents:

The PAQ: The agency has a policy that requires that detainees be screened to assess their risk of sexual victimization or risk of sexually abusing other detainees.

Online Pre-Audit Questionnaire: Based on a review of information the facility provided in the PAQ, in the past 12 months, the number of detainees who were screened for risk of sexual victimization or risk of sexually abusing other detainees was 8.

The auditor reviews the PREA Notice and Screening Form confirmed all detainees are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward their detainees. The following PREA screening questions are asked:

- While in State Police Custody do you feel vulnerable to any type of sexual abuse?
- Does the detainee have a mental, physical, or developmental disability?
- · How old is the detainee?
- · What is the physical build and appearance of the detainee?
- · Has the detainee has previously been incarcerated?
- Does the nature of the detainee's alleged offense and/or criminal history put them at risk for sexual victimization while in CSP custody?

The facility completes a PREA Screening Risk Assessment for all detainees that arrive at the site. The auditor reviewed 57 PREA Notice and Screening Form completed on each detainee to include from hours to overnight stay confirmed that the facility screened to assess detainee risk of sexual victimization or risk of sexual abuse by other detainees.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 4, Section E includes PREA language.

Interviews: Staff Who Perform Screening for Risk of Victimization and Abusiveness – Q: 1, 2 / Random Sample of Staff – Q: 17 / Detainee Interview Questionnaire – Q: 4

Interviewed Staff Who Perform Screening for Risk of Victimization (Trooper) reported

that detainees are interviewed for risk of sexual abuse victimization. The tool is new to the agency. However, the screening will look to see if they feel that they are at risk of being abused, if they have been abused, and whether they feel safe.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. Staff reported that the facility is designed to hold detainees overnight. All their cells are single. However, all detainees are screened for Risk of Victimization even if they only stay for 2 to 6 hours.

Informal conversation with the PREA coordinator confirmed that all detainees, no matter how long they stay at the facility, are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees. This includes overnight and "in and out".

Detainee Interviewed Questionnaire: There were no detainees onsite during the audit process to interview.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review, the auditor asks to observe a person confined in the facility being screened for risk of being sexually abuse or sexually abusive. There was no person being screened during the onsite portion of the audit. The auditor asked staff to walk him through the process for demonstration purposes. Any Law Enforcement Officer can conduct the risk assessment.

Informal conversation with staff indicated that the arresting officer serves as the direct care staff at the time, unless additional assistance is needed. The detainee is taken to the processing area to give a degree of privacy. The staff uses the PREA Notice and Screening Form to assess detainees.

Staff stated that the screening will look to see if the detainees feel that they are at risk of being abused, if they have been abused, and whether they feel safe. No matter how long they stay at the facility, all detainees are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees. This includes overnight and "in and out". The detainees are giving information regarding reporting and posters are located within the facility. Staff inform detainees that the facility has toll-free hotline numbers available to Detainees. Externally, detainees may contact the Connecticut Sexual Assault Crisis Services Line, and that information is provided and displayed the holding area and in the PREA material. Detainees are informed that they can report through third party and verbally to staff.

The auditor informally discusses and reviews the PREA Notice and Screening Form confirmed that all detainees are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward their detainees. The following PREA screening questions are asked:

- · While in State Police Custody do you feel vulnerable to any type of sexual abuse?
- Does the detainee have a mental, physical, or developmental disability?
- How old is the detainee?
- · What is the physical build and appearance of the detainee?
- · Has the detainee has previously been incarcerated?
- Does the nature of the detainee's alleged offense and/or criminal history put them at risk for sexual victimization while in CSP custody?

A staff member is dispatch provides continuous monitoring of the cameras. The cameras have sound and site capabilities. When detainees are in a holding cell and using the restroom, the camera blurs out the area below the waist (automatically).

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.141 (c)

The provision requires, in the lockups described in paragraph (b) of this section, staff shall ask the detainee about his or her own perception of vulnerability.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states Troopers and police officers ask the detainee about his or her own perception of vulnerability.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The staff ask detainees about his or her perception of vulnerability.

The auditor reviews the PREA Notice and Screening Form confirmed all detainees are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward their detainees. Detainees are asked the following PREA screening question regarding their own perception of vulnerability.

· While in State Police Custody do you feel vulnerable to any type of sexual abuse?

A review of 57 PREA Notice and Screening Form completed on each detainee has

the required questions that address detainees' perception of vulnerability.

A review of Policy: DESPP A&O #19.03.30, meets the requirements of the provision.

Interviews: Staff Who Perform Screening for Risk of Victimization and Abusiveness – Q: 2

Interviewed Staff Who Perform Screening for Risk of Victimization (Trooper) reported that detainees are interviewed for risk of sexual abuse victimization. The tool is new to the agency. However, the screening will look to see if they feel that they are at risk of being abused, if they have been abused, and whether they feel safe. Upon proof the staff was able to discuss additional questions such as age, prior history of incarceration, disabilities, or other vulnerabilities.

Detainee Interview Questionnaire: There were no detainees onsite during the audit process.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor inspects the detainee screening area, ensuring privacy and confidentiality. Refer to provision (b) for site review details.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.141 (d)

The provision requires that the screening process in the lockups described in paragraph (b) of this section should also consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization:

- · Whether the detainee has mental, physical, or developmental disability.
- · The age of the detainee.
- The physical build and appearance of the detainee.
- · Whether the detainee has previously been incarcerated; and
- The nature of the detainee's alleged offense and criminal history.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states that the following criteria are considered, to

the extent that the information is available:

- · Whether the detainee has a mental, physical, or developmental disability.
- · The age of the detainee.
- The physical build and appearance of the detainee.
- · Whether the detainee has previously been incarcerated.
- The nature of the detainee's alleged offense and criminal history.

#### Review of Documents:

A review of the PREA Screening Risk Assessment tool confirmed that all the abovementioned areas are considered doing intake process.

The auditor reviews the PREA Notice and Screening Form and confirmed the following PREA screening questions:

- While in State Police Custody do you feel vulnerable to any type of sexual abuse?
- Does the detainee have a mental, physical, or developmental disability?
- How old is the detainee?
- · What is the physical build and appearance of the detainee?
- · Has the detainee has previously been incarcerated?
- Does the nature of the detainee's alleged offense and/or criminal history put them at risk for sexual victimization while in CSP custody?

A review of 57 PREA Notice and Screening Form completed on each detainees asked the required information.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Staff Who Perform Screening for Risk of Victimization and Abusiveness – Q: 2 / Random Sample of Staff – <math>Q: 17

Interviewed Staff Who Perform Screening for Risk Victimization reported (Trooper) that detainees are interviewed for risk of sexual abuse victimization. The tool is new to the agency. However, the screening will look to see if they feel that they are at risk of being abused, if they have been abused, and whether or not they feel safe. Upon probing the staff was able to discuss additional questions such as age, prior history of incarceration, disabilities, or other vulnerabilities.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. Staff

reported that the facility is designed to hold detainees overnight. All their cells are single. However, all detainees are screened for Risk of Victimization even if they only stay for 2 to 6 hours.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.151	Detainee reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.151 (a)
	The provision requires, the agency to provide multiple ways for detainees to privately report sexual abuse and sexual harassment, retaliation by other detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F: Detainees may report in multiple ways the following: 1. Page 7 Sexual abuse and/or sexual harassment that occurred within a department lockup; (b) Retaliation by other detainees, department employees, or police officers under the jurisdiction and direction of the Division of State Police for reporting sexual abuse and/or sexual harassment; and staff neglect or violation of

responsibilities that may have contributed to such an incident.

#### Review of Documents:

Online Pre-Audit Questionnaire: The agency has established procedures allowing for multiple internal ways for detainees to report privately to agency officials about sexual abuse or sexual harassment; retaliation by other detainees or staff reporting sexual abuse and sexual harassment; and staff neglect or violation of responsibilities that may have contributed to such incidents.

A review of the Zero Tolerance for Detainee Sexual Abuse and Sexual Harassment included the following report processes:

- Call Connecticut State Police PREA Complaint line at (877-746-1922.
- Report to any staff, volunteer, contractor, medical or mental health staff.
- Report to the PREA Coordinator.
- Tell a family member, friend, legal counsel, or anyone else outside the facility. Note: They can report on your behalf by calling (877-746-1922)
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed.

Poster (English and Spanish) confirmed that the agency/facility provides multiple internal ways to report allegations of sexual abuse and sexual harassment.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Random Sample of Staff – Q: 6 / Detainee Interview Questionnaire – Q:5,

Interviewed PREA Coordinator (previously interviewed) reported that outside agencies have a system in place to report the alleged incident immediately. Reports can also be made anonymously or by a third party. All complaints will be immediately reported to an investigator and investigated upon receipt. The detainees are provided with a phone number to report the incident to an outside agency and will be allowed to make a phone call to report it. In addition, they can make a phone call to have someone else report it on their behalf.

Detainee Interviews: There were no detainees to interview regarding, how to report sexual abuse or sexual harassment at this facility.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review the auditor observed some PREA signage in the holding cell area. The auditor observed that the facility provides detained access to writing instruments, paper, and forms to report with. The auditor evaluated the facility systems by which detaineds in the facility can report sexual abuse and/or sexual

harassment. Detainee can report by using the internal process or written format or using the phone. Informal conversations with staff reported that at times the detainee will have their personal devices on them unless placed in a holding cell. Detainees are rarely placed in a holding cell as they are immediately released or transferred.

Detainees are informed of the different ways to report, and how to access the internal and external reporting process. During the site visit the auditor request that staff demonstrate and walk through the intake process, where they conduct PREA screening. Informal conversations with staff reported that the facility has toll-free hotline numbers available to Detainees. Externally, detainees may contact the Connecticut Sexual Assault Crisis Services Line for emotional support services, and that information is provided and displayed the holding area and in the PREA material.

The agency has documents in Spanish and English. The site utilizes language line services if there is limited English-speaking individual. The auditor reviewed the Information and Support Services Advocacy cards that are given to all detainees. The card has the following services in English and Spanish for emotional support services with contact numbers:

- Office of Victim Services (OVS) 1-800-822-8428
- Department of Correction Victim Services Unit 1-888-869-7057
- Sexual Assault (The Alliance) 1-888-999-5545
- · Elder Abuse 1-888-385-4225
- Child Abuse Care Line 1-800-842-2288
- Office of the Victim Advocate 1-888-771-3126
- Advocacy for Persons with Disabilities (OPA) 1-800-842-7303
- · Immigration Services (USCIS) 1-800-375-5283

The signage was provided in English and translated to Spanish for the other language most commonly spoken in the facility. The signage text size, formatting, and physical placement accommodates most readers, including those of average height. The information provided by the signage is not obscured, unreadable by graffiti, or missing due to damage.

During the site review the auditor requested to see the location where records are kept. Staff reported that records are only held onsite temporarily in the supervisor's office. Records are transported to the state headquarters.

It was further reported that if vulnerability is identified they will notify the receiving site of the detainee.

Corrective Actions: None

## **Provision Findings:**

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.151 (b)

The provision requires the agency to also inform detainees of at least one way to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials, allowing the detainee to remain anonymous upon request.

Documentary Evidence (Policy, Review of Documents)

## Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section Fb.2: Detainees shall be informed of at least one way to report sexual abuse or sexual harassment to public or private entity or office that is not part of DESPP, and that is able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to DESPP officials, allowing the detainee to remain anonymous upon request.

#### Review of Documents:

A review of the Zero Tolerance Poster (English and Spanish) confirmed that the agency/facility provides multiple internal ways to report allegations of sexual abuse and sexual harassment.

A review of the Zero Tolerance for Detainee Sexual Abuse and Sexual Harassment included the following report processes:

- Call Connecticut State Police PREA Complaint line at (877-746-1922.
- · Report to any staff, volunteer, contractor, medical or mental health staff.
- · Report to the PREA Coordinator.
- Tell a family member, friend, legal counsel, or anyone else outside the facility. Note: They can report on your behalf by calling (877-746-1922)
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed.

Poster (English and Spanish) confirmed that the agency/facility provides multiple internal ways to report allegations of sexual abuse and sexual harassment.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section Fb.2 includes PREA language.

Interviews: PREA Coordinator - Q: 7, 8 / Detainee Interview Questionnaire - Q: 5, 6

PREA coordinator (previously interviewed) reported that the facility provides at least one way for detainees to report abuse or harassment to a public or private entity or office that is not a part of the agency. The detainees are provided with a phone number to report the incident to an outside agency and will be allowed to make a phone call to report. In addition, detainees can make a phone call to have someone else report it on their behalf.

PREA coordinator (previously interviewed) reported that these procedures (reporting) enable review and immediate transmission of detainee report of sexual abuse and sexual harassment to agency officials that allow the detainee to remain anonymous upon request. Outside agencies have a system in place to report the alleged incident immediately. Reports can also be made anonymously or by a third party. All complaints will be immediately reported to an investigator and investigated upon receipt.

Detainee Interviews: There were no detainees to interview regarding whether detainees are allowed to make a report without having to give their name or report anonymously.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review the auditor observed some PREA signage in the holding cell area. The auditor observed that the facility provides detainee access to writing instruments, paper, and forms to report with. The auditor evaluated the facility systems by which detainees in the facility can report sexual abuse and/or sexual harassment. Detainee can report by using the internal process or written format or using the phone. Informal conversations with staff reported that at times the detainee will have their personal devices on them unless placed in a holding cell. Detainees are rarely placed in a holding cell as they are immediately released or transferred. The phone is located in the processing area where detainees can use the phone to call the posted hotlines or family members.

Review site review notes in provision (a).

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.151 (c)

The provision requires staff to accept reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section Fb.1.2: Staff shall accept reports made verbally, in writing, and anonymously. 1. Any verbal reports of sexual abuse and/or sexual harassment shall be documented by means of a written incident report.

Review of Documents: None

Online Pre-Audit Questionnaire: The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports.

The auditor requests any documentation of detainees reports a sexual abuse or sexual harassment made verbally, in writing, anonymously or by third parties. The facility provided the auditor with zero allegations and PREA investigations packages.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section Fb.1.2 includes PREA language.

Any verbal reports of sexual abuse and/or sexual harassment shall be documented by means of a written incident report.

Interviews: PREA Coordinator - Q: 7, 8 / Detainee Interview Questionnaire - Q: 5, 6

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers stated that detainees have the option to report verbally, anonymously, and third parties. Troopers reported that detainees are only detained for a brief period of time at their processing area and are not allowed to have writing instruments therefore they would be unable to write report. If a detainee does choose to report verbally, the troopers affirmed that they would promptly notify their supervisor, complete the necessary PREA form, and take immediate action.

Detainee Interviews: There were no detainees to interview regarding, making reports of sexual abuse or sexual harassment either in person or in writing.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.1151 (d)

The provision requires the agency to provide a method for staff to privately report sexual abuse and sexual harassment of detainees.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section F3.a: Staff and Department Reporting. A. Staff, including police officers under the jurisdiction and direction of the Division of State Police, may privately report sexual abuse and/or sexual harassment by contacting the PREA Coordinator, filing a complaint with the Internal Affairs Unit, or utilizing the third-party contact phone number posted on the DESPP website.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has established procedures for staff to privately report sexual abuse and sexual harassment of detainees.

Online Pre-Audit Questionnaire: Staff are informed of these procedures below in the shift briefing and PREA training.

A review of the Zero Tolerance for Detainee Sexual Abuse and Sexual Harassment included the following report processes that staff can privately report as well:

- Call Connecticut State Police PREA Complaint line at (877-746-1922.
- · Report to the PREA Coordinator.
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed.

Poster (English and Spanish) confirmed that the agency/facility provides multiple internal ways to report allegations of sexual abuse and sexual harassment.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section F3.a includes PREA language.

Interviews: Random Sample of Staff - Q: 5, 6

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troops reported if a report needed to be done privately, they could notify the supervisor, or PREA hotline. All troopers reported that they felt comfortable speaking to supervisors if a report was needed. They will report immediately.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The Troopers indicated that the detainee who alleges sexual abuse, sexual harassment,

retaliation by other or staffing can report to any State Trooper or PREA Coordinator.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

As previously stated, the auditor observed signage for making a report and victim related services in the holding area. The signage was in English and Spanish.

Informal conversation with staff indicated that they reporting methods provided by the facility, call their supervisor, or they can call the PREA coordinator or assistant PREA coordinator.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.154	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.154 (a)
	The provision requires the agency to establish a method to received third-party report of sexual abuse and sexual harassment in its lockups and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a detainee.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7-8, Section F: states that all reports of sexual abuse and sexual

harassment of detainees that are made from third parties are received and investigated to include anonymous reports. 1. This includes anonymous reports.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7-8, Section F3: Staff, including police officers under the jurisdiction and direction of the Division of State Policy, may privately report sexual abuse and/or sexual harassment by contacting the PREA Coordinator, filing a complaint with the Internal Affairs Unit, or utilizing the third-party contact phone number posted on the DESPP website.

Review of Documents:

The PAQ indicates the agency established a method to receive third-party reports of sexual abuse and sexual harassment in its lockups. The facility reported there is access to third-party reporting through their agency website.

Review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The auditor reviews the PREA Unit website https://portal.ct.gov/despp/division-of-state-police/prea-unit. The site included ways for staff to report privately; third-party contact phone number posted on the DESPP website.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

As previously stated, the auditor observed signage for making a report and victim related services near the holding cells. The signage was in English and Spanish.

Posters and information for third party reporting are posted and available in the holding area. Informal conservation with staff confirmed they have been trained to take all allegations and reports seriously and to report them immediately, including those reported by third parties. The verbal reports are to be followed up with a written report immediately.

The agency publicizes information on third party reporting through websites: by posting in public areas of the facility lobby or visitation area and pamphlets. Website: Home (ct.gov).

Review site review in standard 151 (a).

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.161 Staff and agency reporting duties

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.161 (a)

The provision requires that the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in an agency lockup; retaliation against detainees or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F: states that all employees report immediately to the on-duty shift supervisor any knowledge, suspicion, or information regarding an incident of detainee sexual abuse and/or sexual harassments that occurred within a department lockup; any retaliation against detainees, department employees, or police officers under the jurisdiction and direction of the Division of State Police who reported such an incident; ad any employee neglect or violation of responsibilities that may have contributed to an incident of retaliation.

Policy: DESPP Policy A&O #19.03.30 states in addition to the requirements the policy, supervisors receiving reports consider and comply with any other statutory mandatory reporting requirements of vulnerable populations, including:

- Neglected or abused children (Reference A&O 19.05.06).
- Elderly people aged sixty (60) or older (Reference A&O 19.03.07).
- Persons with Intellectual Disability or an individual who receives services from the Department of Social Services' Division of Autism Spectrum Disorder Services

(Reference A&O 19.03.25).

Review of Documents:

Online Pre-Audit Questionnaire: The agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F includes PREA language.

The agency has documents in Spanish and English. The site utilizes language line services if there is limited English-speaking individual. The auditor reviewed the Information and Support Services Advocacy cards that are given to all detainees. The card has the following services in English and Spanish with contact numbers:

- Office of Victim Services (OVS) 1-800-822-8428
- Court and Custody Status Notification (CT SAVIN) 1-877-846-3428
- Department of Correction Victim Services Unit 1-888-869-7057
- Sexual Assault (The Alliance) 1-888-999-5545
- Elder Abuse 1-888-385-4225
- · Child Abuse Care Line 1-800-842-2288
- Office of the Victim Advocate 1-888-771-3126
- Advocacy for Persons with Disabilities (OPA) 1-800-842-7303
- · Immigration Services (USCIS) 1-800-375-5283

The auditor reviews the PREA Unit website https://portal.ct.gov/despp/division-of-state-police/prea-unit. The site included ways for staff to report privately; third-party contact phone number posted on the DESPP website.

Interviews: Random Sample of Staff - Q: 4

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. Troopers indicated a clear understanding of the duty to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the processing center or holding cells. Troopers also reported using the PREA Checklist during the intake process to determine if detainee has been sexually abused or harassed. The various ways trooper indicated that a report could be made included, but not limited to:

Report to supervisor.

- · Report to Major Crime Unit
- DOC Staff or Halfway House Supervisor
- Probation Office
- PREA Hotline

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.161 (b)

The provision requires that apart from reporting to designated supervisors of officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment and investigation decisions.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F: Troopers, police officers, and other staff shall not reveal any information related to a sexual abuse report to anyone other than the extent necessary to make treatment and investigatory decisions.

Review of Documents:

Online Pre-Audit Questionnaire: Apart from reporting to designated supervisors or officials and designated state or local services agencies, the agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F includes PREA language.

Interviews: Random Sample of Staff - Q: 10

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The trooper stated that if they were the first to be notified about alleged sexual abuse, they would inform their supervisor, fill out the necessary PREA form, and obtain any

additional statements required from the supervisor.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The facility has a physical area for collected and maintained hard copes for risk screening information in binders and behind lock doors. The computer system is password protected and accessible only in certain areas.

Review site review in standard 151 (a).

Corrective Actions: None

Provision Findings (Compliance Determination)

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.161 (c)

The provision requires if the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states that in addition to the requirements of the policy, supervisors receiving reports consider and comply with any other statutory mandatory reporting requirements of vulnerable populations, including:

- Neglected or abused children (Reference A&O 19.05.06).
- Elderly people aged sixty (60) or older (Reference A&O 19.03.07).
- Persons with Intellectual Disability or an individual who receives services from the Department of Social Services' Division of Autism Spectrum Disorder Services (Reference A&O 19.03.25).

Review of Documents:

Online Pre-Audit Questionnaire: indicates if the alleged victim is under the age of 18 or considered a vulnerable adult under a State, local vulnerable persons statute, the agency reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Section F includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 11 / PREA Coordinator - Q: 17

Facility Commander reported that if an allegation of sexual abuse or sexual harassment is made by someone under the age of 18, a supervisor would obtain the minimum facts of the allegations and seek input from major crime health professionals and DCF to determine the best way to proceed with the investigation.

PREA coordinator (previously interviewed) reported that how she responds when an allegation of sexual abuse or sexual harassment is made by someone under the age of 18 or someone considered a vulnerable adult under state or local law. When a sexual abuse allegation is made by a juvenile or vulnerable adult detainee, investigators shall ensure that developmentally appropriate protocols are implemented (e.g. Child Advocacy Center interviews, etc...)

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings (Compliance Determination)

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.161 (d)

The provision requires the agency to report all allegations of sexual abuse, including third-party and anonymous reports, to the agency's designated investigators.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F: All allegations of sexual abuse shall be forwarded to a designated sexual abuse investigator who shall investigate the allegation pursuant to section H of this policy. A Computer Aided Dispatch (CAD) Call for Services (CFS) number should be created.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 7, Section F: Third Party Reporting: All reports of sexual abuse and sexual harassment of detainees that are made from third parties shall be received and investigated.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Section F: meets the requirements of the provision.

Review of Documents:

The PAQ indicates the agency reports all allegations of sexual abuse, including third-

party and anonymous reports, to the agency's designated investigators.

There were no reported allegations of sexual abuse or sexual harassment within the past 12 months.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 9

Facility Commanding Officer reported that any report of sexual abuse or sexual harassment would be reported and investigated by an investigator. It was confirmed allegations of sexual abuse and sexual harassment are reported to the PCM and agency/facility.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.162	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.162 (a)
	The provision requires that when an agency learns that a detainee is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the detainee.
	Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section G1.b: states, take immediate action to protect the detainees from substantial risk of imminent sexual abuse; 1. Contact a supervisor to determine further actions to protect the detainee.

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of times the agency or facility determined that a detainee was subject to a substantial risk of imminent sexual abuse was zero. If the agency or facility made such determinations in the past 12 months, the average amount of time (in hours) that passes before acting is N/A.

PAQ: The longest amount of time elapsed (in hours or days) before acting. If not immediate (i.e., without unreasonable delay): NA

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Agency head – Q: 12 / Sheriff, Chief, or Director – Q: 7 / Random Sample of Staff – Q: 12

Agency Head Designee (previously interviewed) report when learned that a detainee is subject to a substantial risk of imminent sexual abuse. The protective action the agency takes is to provide heightened protection while in CSP custody.

Facility Commanding Officer reported that they do not house detainees for long periods of time. There is no contact between detainees. Detainees do not share cells.

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The troopers stated that if it's determined that a detainee is at imminent risk of sexual abuse, they would promptly separate the individual from others, relocate them to another site, notify their supervisor, and initiate these actions immediately.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversation during the site review with staff indicated that the agency requires all staff to take immediate action to protect detainees who are subject to a substantial risk of imminent sexual abuse.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.163	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.163 (a)
	The provision requires, upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section F: states that upon any trooper or police officer during his or her duties receiving an allegation that a detainee was sexually abused while confined at a non-department facility (e.g. a Connecticut correctional facility or Judicial lockup), the following individuals shall be notified through the chain of command as soon as possible:
	Review of Documents:
	The PAQ indicates upon receiving an allegation that a detainee was sexually abused while confined at another facility, the Facility Commander that received the allegation notifies the Facility Commander or appropriate office of the agency where the alleged abuse occurred within 72 hours of becoming aware of the allegation.
	Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of allegations the facility received that a detainee was abused while confined at another facility was 0.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The commanding officer of the Troop area has operational responsibility for the facility in question.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Upon receiving an allegation that a detainee was sexually abused while confined to another facility, the Facility Commander of the facility that received the allegation will notify the head of the facility or appropriate office.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.163 (b)

The provision requires such notification to be provided as soon as possible, but no later than 72 hours after receiving the allegation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section F: states that upon receiving such notification, the Commanding Officer of the Troop area having operational responsibility for the facility in question shall notify, or cause to be notified, the head of the facility or appropriate office of the agency where the alleged abuse occurred (e.g. Department of Correction (DOC) PREA Unit, Chief Judicial Marshal, etc.), according to any existing protocol arrangements.

- $\cdot$  Notification is provided as soon as possible, but no later than seventy-two (72) hours after receiving the allegation.
- Notification is documented using a method prescribed by the PREA Coordinator.

Review of Documents:

The PAQ indicates the Facility Commander will make this notification within 72 hours of becoming aware of the allegation.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.163 (c)

The provision requires the agency to document that it has provided such notification.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section Fb2: Notification is documented using a method prescribed by the PREA Coordinator.

Review of Documents: None

Online Pre-Audit Questionnaire: The agency policy requires that the notifications are documents according to the provision.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section Fb2 includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversation with the PREA Coordinator confirmed that the notification is documented.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.163 (d)

The provision requires the facility head or agency office that receives such notification to ensure that the allegation is investigated in accordance with these standards.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, 1, f, states all allegations of sexual abuse shall be forwarded to a designated sexual abuse investigator who shall investigate the allegation pursuant to section H of this policy.

A Computer Aided Dispatch (CAD) Call for Service (CFS) number should be created.

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of allegations of sexual abuse the facility received from other facilities was 0.

The agency office that receives such notification ensures that the allegation is investigated in the same way as all investigations. However, there were no reports, meaning no notification.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section includes PREA language.

Interviews: Agency head – Q:5 / Sheriff, Chief, or Director – Q: 12, 13

Agency Head Designee (previously interviewed) report if another agency or a facility within another agency refers allegations of sexual abuse or sexual harassment that occurred within one of your facilities, the PREA coordinator is the designated point of contact. It was asked what happens when your agency (or a facility within your agency) receives such allegations. An investigation team is sent out to investigate and notifications within the agency are made. The was no examples of such allegations being reported from another facility or agency.

The Facility Commanding Officer says that there is no segregated housing and that they do not house individuals overnight. The average length of time onsite is one hour.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

shall:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.164	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.164 (a)
	The provision requires upon learning of an allegation that a detainee was sexually abused, the first law enforcement staff member to respond to the report shall be required to:
	· Separate the alleged victim and abuser.
	· Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
	· If the abuse occurred within a time that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating defecating, smoking, drinking, or eating; and
	· If the abuse occurs within a time that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8, Section G1.2: Upon learning of an allegation that a detainee was sexually abused, the first trooper or police officer to respond to such report

- Separate the alleged victim and abuser.
- Take immediate action to protect the detainee from substantial risk of imminent sexual abuse:
- Contact a supervisor to determine further actions to protect the detainee.
- Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- · If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate:
- · Washing; Brushing teeth; Changing clothes, Urinating, Defecating, Smoking, Drinking, or Eating

#### **Review of Documents:**

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of allegations that a detainee was sexually abused is 0. Of these allegations, the number of times the first security staff member responded to the report separated the alleged victim and abuser is 0. In the past 12 months, the number of allegations where staff were notified within a time that is still allowed for the collection of physical evidence is 0.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The first law enforcement staff member to respond will implement the required reporting steps according to policy.

Interviews: Law Enforcement Staff and Non-Law Enforcement Staff First Responders – Q: 1

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The trooper stated that if they were the first to be notified about alleged sexual abuse, they would inform their supervisor, fill out the necessary PREA form, and obtain any additional statements required from the supervisor.

Interviewed Law Enforcement Staff report that they would separate the involved parties, secure the area, and gather all of the evidence. The person would be taken offsite for medical examinations. They would ask the detainee if they would like medical care. It should also be noted that all law enforcement considered as first responders.

Interviewed Non-Law Enforcement Staff interviewed indicated that they are not allowed to be in the lock up without the presence of law enforcement staff.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversation with troopers indicated that they are fully aware of the first responder protocols.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.164 (b)

The provision requires if the first staff responder is not a law enforcement staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify law enforcement staff.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, of the allegations that a detainee was sexually abused made in the past 12 months, the number of times a non-law enforcement staff member was the first responder was 0. Of those allegations responded to first by a non-law enforcement staff member, the number of times that the staff member requested that the alleged victim not take any actions that could destroy physical evidence was 0. Of those allegations responded to first by a non-law enforcement staff member, the number of times that the staff member notified law enforcement was 0.

The facility staffing plan indicates civilian (non-sworn) staff, volunteers, or contractors shall not enter the processing/lockup area when there are any detainees present. The civilian staff, volunteers, and contractors shall have direct contact with arrestees. If there are exigent circumstances and a contractor must perform work while an arrestee is present, a sworn trooper must always accompany the contractor.

Interviews: Law Enforcement Staff and Non-Law Enforcement Staff First Responders – Q:1 / Random Sample of Staff – Q: 10

Twelve random troopers were interviewed by the auditor's non-certified support staff. 9 White, 0 Asian, 3 Black and 0 Hispanic. Nine males and three females. The trooper stated that if they were the first to be notified about alleged sexual abuse, they would inform their supervisor, fill out the necessary PREA form, and obtain any

additional statements required from the supervisor.

Interviewed Law Enforcement Staff report that they would separate the involved parties, secure the area, and gather all of the evidence. The person would be taken offsite for medical examinations. They would ask the detainee if they would like medical care. It should also be noted that all law enforcement considered as first responders.

Interviewed Non-Law Enforcement Staff interviewed indicated that they are not allowed to be in the lock up without the presence of law enforcement staff.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversations with the non-law enforcement staff confirmed that they have taken the same PREA training as the law enforcement officers and are required to follow the same protocols.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.165	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.165 (a)
	The provision requires the agency to develop a written institutional plan to coordinate actions taken in response to a lockup incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and agency leadership.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 4. 2, h, States the PREA Coordinator shall develop a written plan to coordinate response among staff first responders, medical and mental health practitioners, investigators, and department leadership to an incident of sexual abuse.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and agency leadership.

The agency has developed a plan to coordinate actions taken in response to a lockup incident of sexual abuse. It should be noted that the site does not have medical and mental health staff.

A review of Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 4. 2, h, includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 14

The Facility Commanding Officer reported that it is the standard procedure to notify the individual of the outcome of an investigation.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.165 (b)

The provision requires if a victim is transferred from the lockup to a jail, prison, or medical facility, the agency shall, as permitted by law, inform the receiving facility of the incident and the victim's potential need for medical or social services, unless the victim requests otherwise.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section D: DESPP has implemented a coordinated response plan to ensure appropriate actions are taken in response to a lockup incident of sexual abuse. 1. If a victim is transferred from the lockup to a jail, prison, another agency's lockup, or medical facility, inform the receiving facility of the incident and the victim's potential need for medical or social services, unless the victim requests otherwise.

**Review of Documents:** 

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of victims transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse was 0. In the past 12 months, the number of those victims transferred as a result of an allegation of sexual abuse where the agency informed the receiving facility of the incident and the victims' potential need for medical of social services was 0. In the past 12 months, the number of those victims transferred as a result of an allegation of sexual abuse who requested the agency not inform the receiving facility was 0.

The agency requires if a victim is transferred from the lockup to a jail, prison, or medical facility, the agency inform the receiving facility of the incident and the victims' potential need for medical or social services.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section D includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 15

The Facility Commanding Officer reported that it is a standard procedure to inform the facility of the incident and the potential for medical or social services unless otherwise requested by the victim.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility,

facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

## 115.166

# Preservation of ability to protect detainees from contact with abusers

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.166 (a)

The provision requires neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter or renew any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

The PAQ indicates neither the agency nor any other governmental entities are responsible for collective bargaining on the agency's behalf. There are no agreements in place that limit the agency's authority to remove alleged sexual abusers from contact with inmates. There have been no new collective agreements since August 20, 2012.

The auditor reviews the Trooper's union agreement titled: State Police Bargaining Unit Contract Between State of Connecticut and Connecticut State Police Union (Effective July 1, 2022 – Expiring June 30, 2026, and confirmed that the agreement meets the PREA standards requirements.

Interviews: Agency Head - Q: 6

Agency Head Designee (previously interviewed) report no agreement for higher level administrators or any governmental entity responsible for collective bargaining on the agency behalf, entered into or renewed any collective bargaining agreements or other agreements since August 20, 2012.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

There is a Troopers union agreement that does not limit the agency's ability to remove alleged staff sexual abusers from contact with detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. There have not been any collective bargaining agreements since August 20, 2012.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.166 (b)

The provision that requires nothing in this standard shall restrict the entering into or renewal of agreement that govern:

Provision Findings:

Auditor is not required to audit this provision.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.167	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.167 (a)
	The provision requires the agency to establish a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff and shall designate which staff members or departments are charged with monitoring retaliation.
	Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J: Detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations shall be protected from retaliation by other detainees or staff.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has a policy to protect all detainees and staff who report sexual abuse or sexual harassment.

A review of Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The facility did not perform Retaliation Monitoring due to the duration of the detainee's stay at the facility.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.167 (b)

The provision requires the agency to employ multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section J2: The commanding officer of any troop or unit that contains one or more lockup facilities shall ensure that multiple measures are employed for the protection against retaliation, such as the following:

- Removing alleged staff or detainee abusers from contact with victims.
- · Providing emotional support services, whether through existing employee

support programs or not, for staff who were reported to have suffered sexual abuse or sexual harassment or for cooperating with investigators.

Review of Documents:

Online Pre-Audit Questionnaire: The agency employs multiple protection measures, such as housing changes or transfers for detainees' victims or abusers, removal of alleged staff or detainee abusers from contact with victims.

Review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section J2 includes PREA language.

Interviews: Agency Head – Q: 7 / Sheriff, Chief, or Director – Q: 16 / Designated Staff Member Charged with Monitoring Retaliation (or Sheriff/Chief/ Director if not available) – Q: 1, 2, 3

Agency Head Designee (previously interviewed) report that the agency protects detainees and staff from retaliation for sexual abuse or sexual harassment allegations by separate the accused and victim and provide medical/support services to the victim.

The Facility Commander reported that it isn't applicable if detainees are not held onsite. However, if staff were involved, they would be held accountable according to CSP policies and union policies. Complainants or victims would be protected.

Interviewed Designated Staff Member Charged with Monitoring Retaliation reported that as duty supervisors if there was concern or if there was a need to prevent retaliation, they would separate the parties involved and investigate. They would look for monitoring of the parties involved, video monitoring, and increase monitoring if needed for a detainee. The detainees are only onsite for 1-2 hours. If there are any alleged or identified concerns of retaliation, they would directly speak to the parties involved and preserve any necessary evidence associated with the allegation.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversation with staff reported do the setting up of the site, the detainees do not stay overnight and typically no longer than two hours. If allegations are made the detainees will be released from the site prior to the implementation of retaliation monitoring.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.167 (c)

The provision requires the agency to monitor the conduct and treatment of detainees or staff who have reported sexual abuse and of detainees who were reported to have suffered sexual abuse and shall act promptly to remedy such retaliation.

Documentary Evidence (Policy, Review of Documents)

### Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section J3: states the department monitors the conduct and treatment of detainees or staff who have reported sexual abuse and of detainees who were reported to have suffered sexual abuse. Commanders act promptly to remedy any retaliation.

#### **Review of Documents:**

The PAQ indicates except in instances where the agency determines that a report of sexual abuse is unfounded, the agency:

- Monitor the conduct and treatment of detainees or staff who have reported sexual abuse.
- Monitor the conduct and treatment of detainees or staff who were reported to have suffered sexual abuse.
- · Act promptly to remedy any such retaliation.

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of times an incident of retaliation occurred in the past 12 months was 0.

Review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 8-9, Section J3 includes PREA language.

The agency monitors the conduct and treatment of detainees or staff who have reported sexual abuse and of detainees who were reported to have suffered sexual abuse promptly to remedy retaliation.

Interviews: Sheriff, Chief, or Director – Q: 16 / Designated Staff Member Charged with Monitoring Retaliation (or Sheriff/Chief/ Director if not available) – Q: 1, 2, 3

Facility Commanding Officer reported, depending on the complaint and the subsequent investigation, all efforts would be made to maintain a safe working environment while not violating anyone's right. The detainees do not stay onsite.

Interviewed Designated Staff Member Charged with Monitoring Retaliation reported when looking for signs of retaliation they would look to see if someone is not willing to talk or the party directly reports concern. Since they are onsite for a limited time, they would typically have a detainee report any concerns. Once an allegation is made, they would immediately separate involved parties and secure the camera

footage.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.167 (d)

The provision requires if any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J5: states if any other individual who cooperates with an investigation expresses a fear of retaliation, the department will take appropriate measures to protect that individual against retaliation.

**Review of Documents:** 

The PAQ indicates any other individual who cooperates with an investigation expresses a fear of retaliation, the agency takes appropriate measures to protect that individual against retaliation.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J5 includes PREA language.

Interviews: Agency Head - Q: 7 / Sheriff, Chief, or Director - Q: 16

Agency Head Designee (previously interviewed) report that if an individual who cooperates with an investigation expresses a fear of retaliation, the agency takes measures to protect that individual against retaliation. The agency uses single cell housing and continuously monitors all detainees, and ager consultation with a supervisor.

The Facility Commander reported that most detainees do not stay onsite, however, if a staff member was found at fault, they would be held accountable according to CSP policies and union policies. All efforts would be made to maintain a safe working environment while not violating anyone's union rights.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.167 (e)

The provision requires an agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

**Provision Findings:** 

Auditor is not required to audit this provision.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.171 Criminal and administrative agency investigations

**Auditor Overall Determination: Meets Standard** 

#### **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.171 (a)

The provision requires when the agency conducts its own investigation into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J: states that DESSP ensure that an administrative and/ or criminal investigation is completed for all allegations of sexual abuse and sexual

harassment.

Review of Documents:

Online Pre-Audit Questionnaire: The agency conducts its own investigation into allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively for allegations to include third-party and anonymous reports.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Investigative Staff - Q: 5, 8

Investigative Staff (previously interviewed) reported how long does it take to initiate an investigation following an allegation of sexual abuse or sexual harassment. Investigations begin immediately following notification of the incident, and the same protocols are used regardless of how the incident is reported, whether it is in person, telephonically, verbally, third party, by mail or anonymously.

Investigative Staff (previously interviewed) reported that the investigators handle anonymous or third-party reports of sexual abuse or sexual harassment allegations are not investigated differently. All complaints/allegations should be handled the same regardless of how it was reported.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (b)

The provision requires where sexual abuse is alleged, the agency use investigators who have received special training in sexual abuse investigations pursuant to 115.134.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1: DESPP shall ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. (b) Investigators who have received special training in sexual abuse investigations pursuant to section N (6) a below shall be used when sexual abuse is

alleged.

Policy: DESPP A&O #19.03.30 states that in addition to the general training requirements, the department ensures that department investigators that conduct detainee sexual abuse investigations have received training in conducting investigations in confinement settings.

Policy: DESPP A&O #19.03.30 states that specialized training includes:

- Techniques for interviewing sexual abuse victims.
- · Proper use of Miranda and Garrity warnings.
- Sexual abuse evidence collection in confinement settings.
- The criteria and evidence required to substantiate a case for administrative action or prosecution referral.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency requires all investigations to be conducted by staff who have received special training in sexual abuse investigations.

The auditor reviews the training log of 57 investigators for special training in sexual abuse investigations that confirmed the required training.

The auditor confirmed that investigators take the Specialized Training for Investigators from the PREA Resource Center Specialized Training: Investigating Sexual Abuse in Confinement Setting (9 modules).

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Investigative Staff - Q: 1, 2

The Investigative Staff (previously interviewed) stated that they have completed training specific to conducting sexual abuse investigations. The training included a wide array of topics from the language that should be used, interview techniques, statistics, application of Miranda and Garrity warnings, the culture of inmates (i.e. code of silence), understanding/ recognizing trauma responses in victims, an overview of forensic examinations, evidence collection procedure specific to confinement, different techniques used to interview adults versus juveniles, and finally the outcome following the investigation/report. What will qualify for administrative versus criminal prosecution.

The auditor reviews the PREA Specialized Training: Investigating Sexual Abuse in Confinement Settings acknowledgement sheets. The training consists of 9 modules and can be accessed online. The auditor reviews forms with staff signature and date.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (c)

The provision requires investigators to 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1: states that investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency policy requires investigators to gather information and preserve direct and circumstantial evidence.

The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse or staff sexual misconduct). There were no PREA investigation cases to review.

The auditor's review of the PREA investigations process shows that the following information is captured in the reports:

- · Investigation Report (DPS-683-E) Revised 2/3/06.
- · Report Type: Initial Report Prosectors Report Supplement: Re-open; Assist; or closing.
- · Attachments: Teletype Photos Sketch map Evidence Others
- · Incident Date Time Primary Officer Badge Number

- · Investigating Officer Badge Number
- Incident Address
- Status Code: C-Complainant / V-Victim / A-Arrestee / J-Juvenile / H- Other / M-Missing / W-Witness /O- Offender/Accused / T-TOT
- · Incident Date/Time: Original Case: / PREA Compliant
- · Name of Subject (Sex, Race, Height, Weight
- · Involved Officer (s)
- · Name (s) of Witness (es)
- Medical Assistance Provided: Medical Note
- Narrative
- Arrested/Processing
- BWC/Dashcam
- Conclusion/Findings
- Attachments: Incident Report /Form (DPS-683-E) / Witness Statement Form (DPS-633-C) / Criminal Press Summary (DPS-90-C) / PREA Notice and Screening Form (DESPP-0103-C) / CAD Remarks
- Collect/NICI
- Case Status

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1 includes PREA language.

Interviews: Investigative Staff - Q: 6, 7, 9

Investigative Staff (previously interviewed) stated that all investigations follow practically the same investigative format. Interviews are usually conducted with the victim first, then any witnesses, leaving the perpetrator for last. Protocol varies slightly if it is an alleged sexual harassment rather than an alleged sexual assault or sexual abuse.

The first step in initiating an investigation and how long would they take are: Crime scene secured/preserved; Separate victim and accused/alleged perpetrator; Collect/ Secure Evidence; These steps should be taken as quickly as possible.

Investigative Staff (previously interviewed) when ask to describe the investigation process, photograph the scene; collection of evidence; conduct interviews of victim, accused, witnesses using trauma informed techniques; Review any prior reports or complaints related to the incident or involving the parties; Analyze all information/

evidence/interviews and determine if allegation can be substantiated, unsubstantiated, or unfounded; complete a detailed report documenting your process and findings.

Investigative Staff (previously interviewed) when asked to describe any direct and circumstantial evidence you would be responsible for gathering in an investigation of an incident of sexual abuse. Any statements or physical evidence from victim and suspect as well as forensic medical exam of victim; any physical evidence/area canvases from the scene/secondary scenes; any statement/information collected from witnesses; other sources (i.e. phones, mail, security video, logbooks, etc...)

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (d)

The provision requires when the quality of evidence appears to support criminal prosecution, the agency to conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1: states that when the quality of evidence appears to support criminal prosecution, the department conducts compelled administrative interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Review of Documents:

Online Pre-Audit Questionnaire: When the quality of evidence appears to support criminal prosecution, the agency conducts compelled interviews only after consulting with prosecutors.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1 includes PREA language.

Interviews: Investigative Staff - Q: 10

Investigative Staff (previously interviewed) stated that when they discover evidence

that a prosecutable crime may have taken place, that the agency would consult with prosecutors before conducting compelled interviews.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, inmates, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (e)

The provision requires the credibility of an alleged victim, suspect, or witness to be assessed on an individual basis and shall not be determined by the person's status as detainee or staff. No agency shall require a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1: states that the credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not determined by the person's status as detainee or staff. Submission of a detainee who alleges sexual abuse to a polygraph examination is not used as a condition for proceeding with the investigation of an allegation. 1. Submission of a detainee who alleges sexual abuse to a polygraph examination shall not be used as a condition for proceeding with the investigation of such an allegation.

Review of Documents:

Online Pre-Audit Questionnaire: The agency policy requires the credibility of alleged victims, suspects, or witnesses to be assessed on an individual basis and is not determined by the person's status as detainee or staff.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H1 includes PREA language.

Interviews: Investigative Staff - Q: 11, 12

Investigative Staff (previously interviewed) ask what basis you judge the credibility of an alleged victim, suspect, or witness report that the credibility is assessed on an individual basis and not based on the person's status as detainees or staff. Investigators are to include the basis of credibility assessment in their reports.

Investigative Staff (previously interviewed) were asked would you, under any circumstances, require a detainee's sexual abuse to submit to a polygraph examination or truth telling device as a condition for proceeding with an investigation. The response was no they would not.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (f)

The provision requires administrative investigation:

- Shall include an effort to determine whether staff actions or failures to act contribute to the abuse; and,
- Shall 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H: states that administrative investigations are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.1. Administrative investigations should also include an effort to determine whether staff actions or failures to act contributed to the abuse.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency has a policy that requires administrative investigation to be written format with specific details.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H includes PREA language.

The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse or staff sexual misconduct). There were no PREA investigation cases to review.

The auditor's review of the PREA investigations process shows that the following information is captured in the reports:

- · Investigation Report (DPS-683-E) Revised 2/3/06.
- · Report Type: Initial Report Prosectors Report Supplement: Re-open; Assist; or closing.
- · Attachments: Teletype Photos Sketch map Evidence Others
- · Incident Date Time Primary Officer Badge Number
- · Investigating Officer Badge Number
- Incident Address
- Status Code: C-Complainant / V-Victim / A-Arrestee / J-Juvenile / H- Other / M-Missing / W-Witness /O- Offender/Accused / T-TOT
- · Incident Date/Time: Original Case: / PREA Compliant
- Name of Subject (Sex, Race, Height, Weight
- · Involved Officer (s)
- Name (s) of Witness (es)
- Medical Assistance Provided: Medical Note
- Narrative
- Arrested/Processing
- BWC/Dashcam
- Conclusion/Findings
- Attachments: Incident Report /Form (DPS-683-E) / Witness Statement Form (DPS-633-C) / Criminal Press Summary (DPS-90-C) / PREA Notice and Screening Form (DESPP-0103-C) / CAD Remarks
- Collect/NICI
- Case Status

Interviews: Investigative Staff - Q: 16, 17

Investigative Staff (previously interviewed) were asked, are criminal investigations documented? And what is contained in the report? They include the original complaints/allegations, all investigative steps to include, but not limited to photographs, interviews, evidence collection, all relevant documentation, and findings.

Review above information for what is included in the PREA investigation reports.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review the auditor observes the physical storage area of any information/documentation collected and maintained in hard copy pursuant to PREA standards. Hard copies are kept in the supervisor's office until taken to the record area at the central office.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (g)

The provision requires criminal investigations to 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H: states that criminal investigations are 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.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency requires criminal investigations to be documented in a written report with specific details.

The PAQ indicates that in the past twelve months there were 0 substantiated allegations of conduct that appear to be criminals that were referred to for prosecution.

Review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H includes PREA language.

The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse or staff sexual misconduct). There were no PREA investigation cases to review.

The auditor's review of the PREA investigations process shows that the following information is captured in the reports:

- · Investigation Report (DPS-683-E) Revised 2/3/06.
- · Report Type: Initial Report Prosectors Report Supplement: Re-open; Assist; or closing.
- · Attachments: Teletype Photos Sketch map Evidence Others
- Incident Date Time Primary Officer Badge Number
- · Investigating Officer Badge Number
- Incident Address
- Status Code: C-Complainant / V-Victim / A-Arrestee / J-Juvenile / H- Other / M-Missing / W-Witness /O- Offender/Accused / T-TOT
- · Incident Date/Time: Original Case: / PREA Compliant
- · Name of Subject (Sex, Race, Height, Weight
- · Involved Officer (s)
- Name (s) of Witness (es)
- Medical Assistance Provided: Medical Note
- Narrative
- Arrested/Processing
- BWC/Dashcam
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- Attachments: Incident Report /Form (DPS-683-E) / Witness Statement Form (DPS-633-C) / Criminal Press Summary (DPS-90-C) / PREA Notice and Screening Form (DESPP-0103-C) / CAD Remarks
- Collect/NICI
- Case Status

Interviews: Investigative Staff - Q: 18

Investigative Staff (previously interviewed) were asked, are criminal investigations documented? And what is contained in the report? They include the original complaints/allegations, all investigative steps to include, but not limited to photographs, interviews, evidence collection, all relevant documentation, and findings.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

See site review in provision (f).

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (h)

The provision requires substantiated allegations of conduct that appear to be criminals to be referred to for prosecution.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H: states that substantiated allegations of conduct that appear to be criminal be referred to for prosecution.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K: states when there is probable cause to believe that a detainee sexual abused another detainee in a lockup, the investigating trooper or police officer shall refer the matter to the appropriate prosecuting authority.

**Review of Documents:** 

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of substantiated allegations of conduct that appear to be criminal that were referred to as prosecution since August 20, 2012, or since the last PREA audit, whichever is later was 0.

The auditor requested criminal investigations records, but there were no reported criminal investigations regarding sexual abuse or sexual harassment.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H includes PREA language.

Interviews: Investigative Staff - Q: 13

Investigative Staff (previously interviewed) were asked when they refer cases for prosecution? When upon review of the case, it has been determined that there is sufficient evidence/probable cause exists to indicate that a prosecutable crime has occurred.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews):

The agency requires substantiated allegations of conduct that appear to be criminals to be referred for prosecution.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (i)

The provision requires the agency to retain all written reports referred to in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H: DESPP shall follow the established retention schedule approved by the Connecticut State Library for sex crime case investigations.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L4: States that DESPP shall maintain sexual abuse data collected pursuant to subsection (L) 2 above for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

Review of Documents:

Online Pre-Audit Questionnaire: The agency retains all written reports according to the Connecticut State Library for sex crimes.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section H includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (j)

The provision requires the departure of the alleged abuser or victim from employment or control of the lockup or agency shall not provide a basis for terminating an investigation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H: states that the departure of the alleged abuser or victim from employment with the department or control of the agency does not provide a basis for terminating an investigation.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency requires that the departure of the alleged abuser or victim from employment or control of the lockup or agency does not provide a basis for terminating an investigation.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H includes PREA language.

The auditor requested criminal investigations records, but there were no reported criminal investigations regarding sexual abuse or sexual harassment.

Interviews: Investigative Staff - Q: 14

Investigative Staff (previously interviewed) were asked how do you proceed when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation into his/her conduct? This doesn't change anything. The case will be investigated the same. And how do you proceed when a victim who alleges sexual abuse or sexual harassment or an alleged abuser leaves the facility prior to a completed investigation into the incident? If either the victim or the alleged abuser leaves the facility prior to completion of the investigation the investigator still takes all of the same investigative steps and gathers as much information as possible.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.171 (k)

The provision requires any state entity or Department of Justice component that conducts such investigations to do so pursuant to the above requirements.

**Provision Findings:** 

Auditor is not required to audit this provision.

115.171 (I)

The provision requires when outside agencies investigate sexual abuse, the agency should cooperate with outside investigators and to endeavor to remain informed about the progress of the investigation.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: The agency cooperates with outside investigators, however, the agency has it on certified investigations unit.

Interviews: Sheriff, Chier, or Director – Q: 10 / PREA Coordinator – Q 16 / Investigative Staff – Q: 15

The Facility Commanding Officer reported that an outside agency would not investigate their allegations of sexual abuse.

PREA coordinator (previously interviewed) reported that if an outside agency investigates allegations of sexual abuse, the agency remains informed of the progress of a sexual abuse investigation. The agency investigates all its own allegations.

Investigative Staff (previously interviewed) were asked, when an outside agency investigates an incident of sexual abuse in this facility, what role do you play? Facility staff should fully cooperate, providing any available reports/documentation/video, etc. to assist in an outside investigation.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility,

facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

# 115.172 Evidentiary standard for administrative investigations Auditor Overall Determination: Meets Standard Auditor Discussion

Reasoning and Analysis (By Provisions):

115.172 (a)

The provision requires the agency to impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H: state that DESPP impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Review of Documents:

Online Pre-Audit Questionnaire: The policy requires the investigators to impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

A review of Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Investigative Staff - Q: 19

Investigative Staff (previously interviewed) reported that the standard of evidence require to substantiate allegations of sexual abuse or sexual harassment is the preponderance of the evidence.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

# Overall Findings:

115.176	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.176 (a)
	The provision requires staff to be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section K: state that DESPP employees be subject to disciplinary sanctions up to and including termination for violating agency detainee sexual abuse or detainee sexual harassment policies.
	Review of Documents:
	Online Pre-Audit Questionnaire: The agency policy requires staff to be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
	A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.
	Interviews: N/A
	Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.176 (b)

The provision requires termination to be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies was 0. In the past 12 months, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies was 0.

The agency requires termination to be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.176 (c)

The provision requires disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J: states that disciplinary sanctions for violations of DESPP policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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.

**Review of Documents:** 

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies was 0.

The agency policy requires disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment commensurate with the nature and circumstances of the acts.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section J includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.176 (d)

The provision requires 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section K: states that all terminations for violation of DESPP policy, or resignations by staff who would have been terminated if not for their

resignation, be reported to any relevant licensing bodies.

Review of Documents:

The PAQ indicates disciplinary sanctions for violations of agency polices relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior o termination) for violating agency sexual abuse or sexual harassment policies was 0.

Agency policy requires all terminations for violations of agency sexual abuse or sexual harassment policies.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

115.177	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Reasoning and Analysis (By Provisions):

115.177 (a)

The provision requires that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with detainees and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K: states that any contractor or volunteer who engages in sexual abuse be prohibited from contact with detainees, a criminal investigation by the agency is initiated (unless the activity is clearly not criminal), and the sexual abuse be reported to any relevant licensing bodies.

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of detainees was 0.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.177 (b)

The provision requires the facility to take appropriate remedial measures and shall consider whether to prohibit further contact with detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K: states that the department takes appropriate remedial measures and considers whether to prohibit further contact with detainees, in the case of any other violation of the policy by a contractor or volunteer.

### Review of Documents:

Online Pre-Audit Questionnaire: The agency requires the facility to take appropriate remedial measure and to consider whether to prohibit further contact with detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K includes PREA language.

Interviews: Sheriff, Chief, or Director - Q - 18

The Facility Commanding Officer reported that they do not have volunteers, contractors, or inmate workers.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

115.178	Referral for prosecution for detainee-on-detainee sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.178 (a)

The provision requires when there is probable cause to believe that a detainee sexually abused another detainee in a lockup, the agency shall refer the matter to the appropriate prosecuting authority.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K: states that when there is probable cause to believe that a detainee sexual abused another detainee in a lockup, the investigating trooper or police officer refer the matter to the appropriate prosecuting authority.

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of the allegations above that were referred to the appropriate prosecuting authority was 0.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 19

The Facility Commanding Officer reported that all allegations were being investigated, and action would be taken based on the results of the investigation.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.178 (b)

The provision requires to the extent that the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall inform the investigating entity of this policy.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

PAQ: The agency is responsible for investigating allegations of sexual abuse.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.178 (c)

The provision requires any State entity or Department of Justice component that is responsible for investigating allegations of sexual abuse in lockups to be subject to this requirement.

**Provision Findings:** 

Auditor is not required to audit this provision.

Overall Findings:

115.182	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.182 (a)
	The provision requires detainee victims of sexual abuse in lockups to receive timely, unimpeded access to emergency medical treatment.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 10, Section H: states that DESP has implemented a coordinated

response plan to ensure appropriate actions are taken in response to a lockup incident of sexual abuse.

If a victim is transferred from the lockup to a jail, prison, another agency's lockup, or medical facility, inform the receiving facility of the incident and the victim's potential need for medical or social services, unless the victim requests otherwise.

Other state agencies have documented procedures for notifying the State Police regarding incidents in their respective prisons or lockups so that appropriate investigative action can be taken by State Police personnel.

Victims have timely, unimpeded access to emergency medical treatment.

Review of Documents:

Online Pre-Audit Questionnaire: The agency does not provide medical treatment on site. However, the agency has a policy to ensure that victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment.

The PAQ indicates detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment. Emergency medical treatment is provided at the local hospital.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 23, 24

The Facility Commanding Officer reported that victims receive timely, unimpeded access to medical treatment. Victims are immediately taken to a medical facility.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.182 (b)

The provision requires treatment services to 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section H: Victims shall have timely, unimpeded access to emergency medical treatment. (a) Treatment services shall be provided to the victim names the abuser or cooperates with any investigation arising out of the incident.

### **Review of Documents:**

The PAQ indicates treatment services are 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.

A review Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 11, Section H includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

115.186	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.186 (a)
	The provision requires the lockup to 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: states that DESPP conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.

**Review of Documents:** 

The PAQ indicates the lockup conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, sans unfounded allegations, including where the allegation is unsubstantiated.

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents was 0.

The facility did not conduct any sexual abuse incident reviews. There were no investigations.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 20

The Facility Commanding Officer reported that the facility does have a sexual abuse incident review team. The team would include the CO of each district, the CO of the training academy or designee and the PREA coordinator.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.186 (b)

The provision requires such review to ordinarily occur within 30 days of the conclusion of the investigation.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section L: states that review ordinarily occurs within 30 days of the conclusion of the investigation.

Review of Documents:

Online Pre-Audit Questionnaire: Based on a review of information that the facility provided in the PAQ, in the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only unfounded incidents was 0.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 9, Section L includes PREA language.

The auditor requested copies of the documents from the Review Team, and there was no sexual abuse investigations into sexual abuse conducted.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.186 (c)

The provision requires the review team to include upper-level management officials, with input from line supervisors and investigators.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: The review team shall include the commanding officer of each district, commanding officer of the Training Academy or designee, and the PREA coordinator. (1) Input from line supervisors and investigating troopers shall be allowed.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors.

A review of Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L includes PREA language.

Interviews: Sheriff, Chief, or Director - Q: 20

The Facility Commanding Officer reported that the facility does have a sexual abuse incident review team. The team would include the CO of each district, the CO of the training academy or designee and the PREA coordinator.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.186 (d)

The provision requires a review team to:

- Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
- Consider whether the incident or allegations was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation or was motivated or otherwise caused by other group dynamics at the lockup.
- Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
- Assess the adequacy of staffing levels in that area during different shifts.
- · Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d) (1) (d)(5) of this section, and any recommendations for improvement and submit such report to the lockup head and agency PREA coordinator.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K: states that the review team considers the following:

- Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
- · Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the lockup.
- Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
- · Assess the adequacy of staffing levels in that area during different shifts.
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
- The PREA Coordinator prepares a report of the review team's findings, including but not necessarily limited to determinations made pursuant to criteria reviewed above, and any recommendations for improvement, and submits such a report to the commanding officer of the lockup and to the Office of the Colonel.

### **Review of Documents:**

Online Pre-Audit Questionnaire: The facility prepares a report of its findings from sexual abuse incident reviews including, but not necessarily limited to, determinations made pursuant to paragraph (d) 1- (d) 5 of this standard and any recommendations for improvement and submits such report to the facility head and PREA Coordinator.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K includes PREA language.

Interviews: Sheriff, Chief, or Director – Q: 21, 22 / PREA Coordinator – Q: 10, 11, 12 / Incident Review Team – Q: 1, 2, 3, 4

The Facility Commander reported that information from the sexual abuse incident review will be prepared in a report, and the findings would make determination and will recommend any necessary improvements to the commanding officer of the facility and the Office of the Colonel.

PREA coordinator (previously interviewed) reported that the facility prepares a report of its finding from the sexual abuse incident reviews, including any determinations per standard 115.186 (d)-1 through (d)5 and any recommendations for improvement. The facility of the assigned department investigations will prepare the report. The report will be reviewed by the PREA coordinator agency and the rest of the incident review team. The review team will see if there was a deviation from policy or a need for policy change.

The PREA coordinator (previously interviewed) reported that these reports are forwarded to the PREA coordinator for review; however, the facility does not have any PREA complaints to date.

PREA coordinator (previously interviewed) reported what actions, if any, do she take after the report has been submitted. The PREA coordinator reviewed the report and the evidence (i.e. Video) to confirm if the report is accurate. The PREA coordinator would schedule a meeting with the incident review team or seek subject matter experts to gather a second opinion on policy violations.

Incident Review Team Member interviewed reported that the incident review team considers all the above when discussing what may have motivated the incident or allegations. The site has not had an incident that requires a review, but upon review, they would look at what contributed to the incident, what could have been done differently, what needs to change in the facility layout, and staffing. The goal will be to look at the entire picture. There are cameras in the holding cells, trooper cars, and body cameras. Site cameras have audio and visual capabilities. If there is an inoperable device, they will address getting it fixed.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.186 (e)

The provision requires the lockup to implement the recommendations for improvement or shall document its reasons for not doing so.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP Policy A&O #19.03.30 states that the recommendations for improvement be implemented at the lockup facility, or the reasons for not doing so be documented by the commanding officer of any troop or unit responsible for the lockup facility in question and forwarded through the chain of command to the PREA Coordinator.

**Review of Documents:** 

The PAQ indicates the lockup implements the sexual abuse incident review teams recommendations for improvement or document its reasons for not doing so.

The facility has not conducted any sexual abuse incident reviews.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section K includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

115.187	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.187 (a)
	The provision requires the agency to collect accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions.
	Documentary Evidence (Policy, Review of Documents)
	Policy:
	Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L: states that the PREA Coordinator ensures that accurate, uniform data for every allegation of sexual abuse at lockups under the direct control of the Division of State Police is collected.
	Policy: DESPP A&O #19.03.30 Section C uses the same set of definitions as the PREA standards.

Review of Documents:

The PAQ indicates the agency collects accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

The 2024 PREA Annual Report review contained for the purpose of the report, the following definitions apply:

- Substantiated –The event was investigated and determined to have occurred.
- · Unfounded The event was determined not to have occurred, or, if the event occurred, the conduct was nonetheless within policy and the alleged perpetrator exonerated.
- · Unsubstantiated The evidence was insufficient to make a final determination that the event occurred.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.187 (b)

The provision requires the agency to aggregate the incident-based sexual abuse data at least annually.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: states that such incident-based sexual abuse data shall be aggregated at least annually, and include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail

Jurisdictions Survey of Sexual Violence conducted by the Department of Justice and designated for lockups.

Review of Documents:

The PAQ indicates the agency aggregates incident-based sexual abuse data at least annually.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.187 (c)

The provision requires the incident-based data collected to include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice, and subsequent form developed by the Department of Justice and designated for lockups.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: states that such incident-based sexual abuse data shall be aggregated at least annually, and include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice and designated for lockups.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency uses the standardized instrument to include, at a minimum, the data necessary to answer the questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

A review of Policy: DESPP A&O #19.03.30 - Prison Rape Elimination Act (PREA)

Standards and Procedures. Page 12, Section L includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

• The 2024 PREA Annual Report review includes at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice as designated for lockups.

Interviews:

Informal conversation with the PREA coordinator confirmed that the agency's first PREA audit and the agency's first annual report will occur next year.

Information conversation with PREA coordinator confirmed that the agency has not had to complete a SSV Report.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.187 (d)

The provision requires the agency to maintain, review, and collect data as needed from all available incident-based documents, including reports, investigations files, and sexual abuse incident reviews.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.187 (e)

The provision requires the agency also to obtain incident-based and aggregated data from any private agency with which it contracts for the confinement of its detainees.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: N/A. the agency does not contact us for the confinement of its detainees.

The agency does not contract with any private agency for the confinement of its detainees.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.187 (f)

The provision requires, upon request, the agency to provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states that upon request, DESPP provide all data from the previous calendar year to the Department of Justice no later than June 30.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

• The 2024 PREA Annual Report review contained data from previous calendar years.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has a policy requiring the agency to provide all such data from the previous calendar year to the Department of Justice no later than June 30. However, the department has not requested any data from the previous calendar year.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

115.188	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115.188 (a)
	The provision requires the agency to review data collected and aggregated pursuant to 115.187 to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:
	· Identifying problem areas.

- Taking corrective action on an ongoing basis.
- Preparing an annual report of its findings and corrective actions for each lockup, as well as the agency.

Documentary Evidence (Policy, Review of Documents)

# Policy:

Policy: DESPP A&O #19.03.30 states that the PREA Coordinator ensures that the data collected in subsection L (2) of the policy is reviewed to assess and improve the effectiveness of the department's sexual abuse prevention, detection, and response policies, practices, and training, including:

- · Identifying problem areas.
- · Taking corrective action on an ongoing basis.
- Preparing an annual report of its findings and corrective actions for each lockup, as well as the department

### **Review of Documents:**

The PAQ indicates the agency review data collection and aggregated pursuant to 115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:

- Identifying problem areas.
- · Taking corrective action on an ongoing basis.
- Preparing an annual report of its findings and corrective actions for each lockup, as well as the department

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

- The 2024 PREA Annual Report review contained no personal identifiable information for staff or detainees.
- PREA Investigation Findings by Facility August 1, 2023 December 31, 2023. The 2023 Summary: The Connecticut State Police implemented the PREA Policy on July 21, 2023. During the reporting period, from August 1, 2023, to December 31, 2023, there were no reported PREA-related allegations across any of the 11 Connecticut State Police Troops. This includes incidents involving detainee-on-detainee interactions, as well as those involving sworn and civilian DESPP

personnel, and constables under the supervision of the Resident State Trooper program.

PREA Investigation Findings by Facility January 1, 2024 – December 31, 2024. The 2024 Summary: During the reporting period from January 1, 2024, to December 31, 2024, three PREA related allegations were reported. Two PREA allegations were reported as staff on detainee sexual misconduct and one was reported as staff on detainee sexual harassment. All three were investigated by specialized investigators and were determined to be unfounded.

Interviews: Agency Designee - Q: / PREA Coordinator - Q:

Agency Head Designee (previously interviewed) reports that the agency uses incident-based sexual abuse data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. Identifying problem areas, taking corrective action on an ongoing basis. Each incident is reviewed by the incident review team and the agency is always reassessing if there are any corrective actions or policy updates needed.

PREA coordinator (previously interviewed) reported that the agency does 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, and training. The incident review team assesses the need for policy changes, training, or additional prevention after each incident. On an annual basis, the PREA coordinator will analyze all data to determine the need for change. The agency ensures that data collected pursuant to 115.187 is securely retained. The PREA screenings are held with the arresting trooper or desk officer. Once released, the PREA screenings are filed away in a locked filling cabinet. The agency does take corrective action on an ongoing basis on these data. As of right now, the facility does not have any complaints. The agency policy was approved in July of 2023.

PREA coordinator (previously interviewed) reported that the agency prepares an annual report of findings from its data review and any corrective actions for each facility, as well as the agency as a whole. The first annual report will be completed in 2025. If there is a complaint, the incident review team will discuss corrective actions for the facility immediately. The incident review team will also suggest corrective actions or policy changes for the agency as a whole and implement them as necessary.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.188 (b)

The provision requires such a report to include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L: states that reports 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.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency has a policy requiring the annual PREA report to include a comparison of the current year's data and corrective actions. However, this is the agency's first PREA audit and the agency's first annual report will occur next year.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

- The 2024 PREA Annual Report review contained comparison information for the current year's data.
- PREA Investigation Findings by Facility August 1, 2023 December 31, 2023. The 2023 Summary: The Connecticut State Police implemented the PREA Policy on July 21, 2023. During the reporting period, from August 1, 2023, to December 31, 2023, there were no reported PREA-related allegations across any of the 11 Connecticut State Police Troops. This includes incidents involving detainee-on-detainee interactions, as well as those involving sworn and civilian DESPP personnel, and constables under the supervision of the Resident State Trooper program.
- PREA Investigation Findings by Facility January 1, 2024 December 31, 2024. The 2024 Summary: During the reporting period from January 1, 2024, to December 31, 2024, three PREA related allegations were reported. Two PREA allegations were reported as staff on detainee sexual misconduct and one was reported as staff on detainee sexual harassment. All three were investigated by specialized investigators and were determined to be unfounded.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, inmates, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.188 (c)

The provision requires the agency's report to be 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 states that the department's annual report prepared in policy subsection L (3)(a)3 above is approved by the Commissioner and made available to the public through the department's public website.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has a policy that requires that the agency's annual report be approved by the agency head and made readily available to the public through the agency website.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data.

The 2024 PREA Annual Report review contained Publications Approval sections with the signatures of Commanding Officer/Bureau of Professional Standards; Commanding Officer/Office of Professional Standards and Training; Commanding Officer/Connecticut State Police; and Commissioner of DESPP. The annual report is readily available to the public through its website.

Interviews: Agency Head - Q: 10

Agency Head Designee (previously interviewed) report that the agency head or designee will approve annual reports written to 115.88. The first annual report will be in 2025.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

Informal conversations with the PREA coordinator confirmed that this is the agency's first PREA audit and the agency's first annual report will occur next year.

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.188 (d)

The provision requires the agency to redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup but must indicate the nature of the material redacted.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L: The department may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup but must indicate the nature of the material redacted.

**Review of Documents:** 

Online Pre-Audit Questionnaire: The agency policy requires that the agency redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

The auditor reviewed the Connecticut State Police 2024 PREA Annual Report submitted by the Accreditation Unit, Bureau of Professional Standards and Compliance. Analysis of the Data:

• The 2024 PREA Annual Report review contained no personal identifiable information for staff or detainees.

Interviews: PREA Coordinator - Q: 15

The PREA coordinator (previously interviewed) reported the types of material are typically redacted from the annual report and indicated that nature of material is redacted. Specific information from all reports will be redacted to prevent any threat to the safety and security of secure facilities, victims, and staff. The PREA annual Report will redact information concerning staff and personal identifiers. This information will be included in the annual report.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

**Auditor Overall Determination: Meets Standard** 

## **Auditor Discussion**

Reasoning and Analysis (By Provisions):

115.189 (a)

The provision requires the agency to ensure that data collected pursuant to 115.187 is securely retained.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L: DESPP shall ensure that data collected pursuant to subsection (L) 2 above is securely retained.

**Review of Documents:** 

The PAQ indicates the agency ensures that data collected is securely retained.

A review of Policy Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures includes PREA language.

Interviews: PREA Coordinator - Q: 13

PREA coordinator (previously interviewed) reported that the agency does 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, and training. The incident review team assesses the need for policy changes, training, or additional prevention after each incident. On an annual basis, the PREA coordinator will analyze all data to determine the need for change. The agency ensures that data collected pursuant to 115.187 is securely retained. The PREA screenings are held with the arresting trooper or desk officer. Once released, the PREA screenings are filed away in a locked filling cabinet. The agency does take corrective action on an ongoing basis on these data. As of right now, the facility does not have any complaints. The agency policy was approved in July of 2023.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.189 (b)

The provision requires the agency to make all aggregated sexual abuse data, from lockups under its direct control and any private agencies 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.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: the department shall make all aggregated sexual abuse data from lockups under its control readily available to the public at least annually, through the department'.

Review of Documents:

Online Pre-Audit Questionnaire: The agency has a policy that requires the agency to make all aggregated sexual data, from lockups under its direct control and any private agencies with which it contracts. The agency does not contact private agencies to hold its detainees.

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.189(c)

The provision requires that before making aggregated sexual abuse publicly available, the agency shall remove all personal identifiers.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L: the department shall make all aggregated sexual abuse data from lockups under its control readily available to the public at least annually, through the department'. (a) Before making any aggregated sexual abuse data publicly available, the department should ensure that all personal identifiable are removed.

Review of Documents:

The PAQ indicates the agency removes all personal identifiers before making aggregated sexual abuse data publicly available.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 13, Section L includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.189(d)

The provision requires the agency to maintain sexual abuse data collected pursuant to 115.187 for at least 10 years after the date of the initial collection unless Federal,

State, or local law requires otherwise.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L: states that DESPP maintains sexual abuse data collected pursuant to subsection (a) 2 of the policy for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

Policy: DESPP A&O #19.03.30 states that DESSP follow the established retention schedule approved by the Connecticut State Library for sex crime case investigations.

**Review of Documents:** 

The PAQ indicates the agency maintains sexual abuse data collected pursuant to 115.187 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise.

A review of Policy: DESPP A&O #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures. Page 12, Section L includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

**Overall Findings:** 

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Reasoning and Analysis (By Provisions):

115.401 (a)

The provision requires during the three-year period starting on August 20, 2013, and during the three-year period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, p. 14, M 1, A-B, states DESPP shall conduct audits pursuant to 28 CFR 115.401 through 28 CFR 115.405 of all lock up facilities operated by the department or under its direct control. Audits need not be conducted of individual lockups that are not utilized to house detainees overnight. The PREA Coordinator shall work in conjunction with affected troop/unit commanders to ensure required audits of lockup facilities are arranged and conducted.

Review of Documents:

The PAQ indicates during the prior three-year audit period, the agency ensures that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once. This is the first time the facility has been audited. This year every lockup in the agency was audited.

Effective 2023 the agency was required to complete its 1st cycle of PREA audits. The agency oversees 11 Trooper sites and has completed the required PREA audits of all sites. The agency's future audit plan is to start with their 2nd cycle August 20, 2024 – August 19, 2025, this cycle will start a third of their sites being audited every three years. This will put the agency in a position to ensure that all its sites are audited according to DOJ PREA cycles.

A review of Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.401 (b)

The provision requires during each one-year period starting on August 20, 2013, the agency shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, p. 14, M 1, A-B, states DESPP shall conduct audits pursuant to 28 CFR 115.401 through 28 CFR 115.405 of all lock up facilities operated by the department or under its direct control. Audits need not be conducted of individual lockups that are not utilized to house detainees overnight. The PREA Coordinator shall work in conjunction with affected troop/unit commanders to ensure required audits of lockup facilities are arranged and conducted.

Review of Documents:

Effective 2023 the agency was required to complete its 1st cycle of PREA audits. The agency oversees 11 Trooper sites and has completed the required PREA audits of all sites. The agency's future audit plan is to start with their 2nd cycle August 20, 2024 – August 19, 2025, this cycle will start a third of their sites being audited every three years. This will put the agency in a position to ensure that all its sites are audited according to DOJ PREA cycles.

Interviews: N/A

A review of Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, meet the requirements of the provision.

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.401 (h)

The auditor shall have access to, and shall observe, all areas of the audited facilities.

Documentary Evidence (Policy, Review of Documents)

Policy:

Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, p. 14, M 1, A-B, states DESPP shall conduct audits pursuant to 28 CFR 115.401 through 28 CFR 115.405 of all lock up facilities operated by the department or under its direct control. Audits need not be conducted of individual lockups that are not utilized to house detainees overnight. The PREA Coordinator shall work in conjunction with affected troop/unit commanders to ensure required audits of lockup facilities are arranged and conducted.

**Review of Documents:** 

Online Pre-Audit Questionnaire: During the site review the auditor observes all areas of the audited facility where detainees are housed and move in and out of the facility.

A review of Policy: Department of Emergency Services and Public Protection (DESPP) A&O Section #19.03.30 – Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Data March 6, 2024, includes PREA language.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

During the site review the auditor received access to all areas of the lockup areas. These areas include but are not limited to maintain control/dispatched room, lockup processing room, front lobby, cells, hallways, exit and entry on detainees.

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.401 (i)

The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information).

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: indicates the auditor shall be permitted to request and receive copies of any relevant documents including electronically stored information.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor requested and received the following documents during the site review:

- Troop Staffing Plans
- Hiring/Application Package for New Hires (Past 12 Months)
- · SPRC (State Police Record Check) System
- FLIQ (NLETS Criminal History Identity) System (Background Checks)
- FLOQW (Person Query Form)
- · Camera Upgrade: NCS Work Orders
- · Nationwide Security Corporation (NSC) Invoices
- Resolving Juvenile Matters Log
- Victim Advocacy Card
- Background Checks
- Troop Roster with contact Information (Cell Numbers)
- · Intake/Vulnerability Assessment Tool (PREA Notice and Screening Forms)
- Detainee Logbook (Juvenile/Adult)
- · Inmate Contract with CT Department of Corrections
- · Personal Property Inventory and Prisoner Processing Form (DPS-68C)
- Agency PREA Annual Report

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and

informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.401 (m)

The auditor shall be permitted to conduct private interviews with inmates, Detainees, and detainees.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

**Review of Documents:** 

Online Pre-Audit Questionnaire: The auditor and the auditor support helper allow interviewing staff that were requested by the auditor. There were no detainees to interview during this period.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

**Provision Findings:** 

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

115.401 (n)

Inmates, Detainees, and detainees shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

Documentary Evidence (Policy, Review of Documents)

Policy: N/A

Review of Documents:

Online Pre-Audit Questionnaire: The auditor Notice of the PREA auditor was posted with the required time frame. This was confirmed by the PREA coordinator taking pictures and sending them to the auditor as well as during site visits, the Notices were posted in the facility. There were no confidential letters.

Interviews: N/A

Observation & Test of Critical Functions (Videos, Informal Conversations, Site

Reviews): N/A

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the

facility is compliant with all provisions in this standard.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Reasoning and Analysis (By Provisions):
	115. 403 (f)
	The agency shall ensure that the auditor's final report is published on the agency's website if it has one or is otherwise made readily available to the public.
	Documentary Evidence (Policy, Review of Documents)
	Policy: N/A
	Review of Documents:
	Effective 2023 the agency was required to complete its 1st cycle of PREA audits. The agency oversees 11 Trooper sites and has completed the required PREA audits of all sites. The agency's future audit plan is to start with their 2nd cycle August 20, 2024 – August 19, 2025, this cycle will start a third of their sites being audited every three years. This will put the agency in a position to ensure that all its sites are audited according to DOJ PREA cycles. The first 8 audits were completed and is posted on the agency website. The last three audits will be posted on the agency website when the final reports completed a file with PREA Resource Center.
	Interviews: N/A
	Observation & Test of Critical Functions (Videos, Informal Conversations, Site Reviews):

The auditor reviews the agency website and confirms that the following Final PREA Reports are listed:

- Troop A Southbury
- Troop B Canaan
- Troop G Bridgeport
- · Troop L Litchfield
- Troop F Wesbrook
- Troop H Hartford
- Troop I Bethany
- · Troop C Tolland
- · Troop D Danielson
- Troop E Montville
- Troop K Colchester

Corrective Actions: None

Provision Findings:

A review of the appropriate documents to include the facility PAQ, interviews and informal conversations with staff, and a review of relevant policies corroborate that the facility is complying with the provisions of this standard.

## Overall Findings:

The auditor uses a triangulation approach by connecting the PREA facility documentation, agency policies, on-site observation, site review of the facility, facility practices, interviewed staff, local and national advocates, and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

Appendix: Provision Findings			
115.111 (a)	Zero tolerance of sexual abuse and sexual harassment		
	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	
115.111 (b)	Zero tolerance of sexual abuse and sexual harassmer	nt	
	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 lockups?	yes	
115.112 (a)	Contracting with other entities for the confinement of detainees		
	If this agency is law enforcement and it contracts for the confinement of its lockup detainees in lockups operated by private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the law enforcement agency does not contract with private agencies or other entities for the confinement of detainees.)	na	
115.112 (b)	Contracting with other entities for the confinement of detainees		
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the law enforcement agency does not contract with private agencies or other entities for the confinement of detainees OR the response to 115.112(a)-1 is "NO".)	na	
115.113 (a)	Supervision and monitoring		

	Does the agency ensure that it has developed for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse?	yes
	Does the agency ensure that it has documented for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse?	yes
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The physical layout of each lockup?	yes
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the detainee population?	yes
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.113 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the lockup document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.113 (c)	Supervision and monitoring	
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: 1. The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: The lockup's	yes

deployment of video monitoring systems and other monitoring technologies?	
In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: The resources the lockup has available to commit to ensure adequate staffing levels?	yes
Supervision and monitoring	
If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Continuous direct sight and sound supervision?	yes
If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Single-cell housing or placement in a cell actively monitored on video by a staff member sufficiently proximate to intervene, unless no such option is determined to be feasible?	yes
Juveniles and youthful detainees	
Are juveniles and youthful detainees held separately from adult detainees? (N/A if the facility does not hold juveniles or youthful detainees (detainees <18 years old).)	yes
Limits to cross-gender viewing and searches	
Does the lockup always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
Limits to cross-gender viewing and searches	
Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
Limits to cross-gender viewing and searches	
Does the lockup implement policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing	yes
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: The resources the lockup has available to commit to ensure adequate staffing levels?  Supervision and monitoring  If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Continuous direct sight and sound supervision?  If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Single-cell housing or placement in a cell actively monitored on video by a staff member sufficiently proximate to intervene, unless no such option is determined to be feasible?  Juveniles and youthful detainees  Are juveniles and youthful detainees held separately from adult detainees? (N/A if the facility does not hold juveniles or youthful detainees (detainees (detainees <18 years old).)  Limits to cross-gender viewing and searches  Does the lockup always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?  Limits to cross-gender viewing and searches  Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches?  Limits to cross-gender viewing and searches  Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches?

	circumstances or when such viewing is incidental to routine cell checks?	
	Does the lockup require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing?	yes
115.115 (d)	Limits to cross-gender viewing and searches	
	Does the lockup always refrain from searching or physically examining transgender or intersex detainees for the sole purpose of determining the detainee's genital status?	yes
	If a detainee's genital status is unknown, does the lockup determine genital status during conversations with the detainee, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.115 (e)	Limits to cross-gender viewing and searches	
	Does the agency train law enforcement staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the agency train law enforcement staff in how to conduct searches of transgender and intersex detainees in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.116 (a)	Detainees with disabilities and detainees who are limental English proficient	nited
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that detainees 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:	yes

115.116	Detainees with disabilities and detainees who are lim	nited
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: are blind or have low vision?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees 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 detainees with disabilities including detainees who: Have intellectual disabilities?	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
	Do such steps include, when necessary, ensuring effective communication with detainees who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that detainees 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 the overall determination notes.)	yes
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have intellectual disabilities?	yes

(b)	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 detainees 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
115.116 (c)	Detainees with disabilities and detainees who are limenses by the second	nited
	Does the agency always refrain from relying on detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under §115.164, or the investigation of the detainee's allegations?	yes
115.117 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees 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 detainees 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 detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: o 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 detainees who: Has been	yes

115.117 (f)	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 detainees or have in place a system for otherwise capturing such information for current employees?	yes
115.117 (e)	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 detainees?	yes
115.117 (d)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with detainees, 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
	Before hiring new employees who may have contact with detainees, does the agency: Perform a criminal background records check?	yes
115.117 (c)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees?	yes
115.117 (b)	Hiring and promotion decisions	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	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?	

	Does the agency ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.117 (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
115.117 (h)	Hiring and promotion decisions	
	Unless prohibited by law, 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
115.118 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new lockup or planned any substantial expansion or modification of existing lockups, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect detainees 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
115.118 (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	yes

	agency's ability to protect detainees 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.)	
115.121 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse in its lockups, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.121 (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
115.121 (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
115.121 (d)	Evidence protocol and forensic medical examinations	
	If the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, does the agency permit the detainee to use such services to the extent available, consistent with security needs?	yes
115.121 (e)	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 entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
115.122 (a)	Policies to ensure referrals of allegations for investig	ations
	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
115.122 (b)	Policies to ensure referrals of allegations for investig	ations
	If another law enforcement agency is responsible for conducting investigations of allegations of sexual abuse and sexual harassment in its lockups, does the agency have a policy in place to ensure that such allegations are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na

	Has the agency published such policy, including a description of responsibilities of both the agency and the investigating entity, on its website or, if it does not have one, made the policy available through other means? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na
	Does the agency document all such referrals? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na
115.131 (a)	Employee and volunteer training	
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: Its zero-tolerance policy and detainees' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: The dynamics of sexual abuse and sexual harassment in confinement, including which detainees are most vulnerable in lockup settings?	yes
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: The right of detainees and employees to be free from retaliation for reporting sexual abuse or harassment?	yes
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to communicate effectively and professionally with all detainees?	yes

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	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.131 (b)	Employee and volunteer training	
	Have all current employees and volunteers who may have contact with detainees received such training?	yes
	Does the agency provide each employee and volunteer with annual refresher information to ensure that they know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
115.131 (c)	Employee and volunteer training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.132 (a)	Detainee, contractor, and inmate worker notification agency's zero-tolerance policy	of the
		of the
	During the intake process, do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and	yes
(a) 115.132	agency's zero-tolerance policy  During the intake process, do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?  Detainee, contractor, and inmate worker notification	yes
(a) 115.132	During the intake process, do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?  Detainee, contractor, and inmate worker notification agency's zero-tolerance policy  Does the agency ensure that, upon entering the lockup, all contractors and any inmates who work in the lockup are informed of the agency's zero-tolerance policy regarding sexual abuse and	yes of the

	conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).)	
115.134 (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 115.121(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 115.121(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 115.121(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 115.121(a).)	yes
115.134 (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 115.121(a).)	yes
115.141 (a)	Screening for risk of victimization and abusiveness	
	If the lockup is not utilized to house detainees overnight, before placing any detainees together in a holding cell do staff consider whether, based on the information before them, a detainee may be at a high risk of being sexually abused? (N/A if the lockup is utilized to house detainees overnight.)	na
	When appropriate, do staff take necessary steps to mitigate such danger to the detainee? (N/A if the lockup is utilized to house detainees overnight.)	na
115.141	Screening for risk of victimization and abusiveness	

(b)		
	If the lockup is utilized to house detainees overnight, are all detainees screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees? (N/A if lockup is NOT used to house detainees overnight.)	yes
115.141 (c)	Screening for risk of victimization and abusiveness	
	In lockups described in paragraph (b) of this section, do staff always ask the detainee about his or her own perception of vulnerability? (N/A if lockup is NOT used to house detainees overnight.)	yes
115.141 (d)	Screening for risk of victimization and abusiveness	
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has a mental, physical, or developmental disability. (N/A if lockup is NOT used to house detainees overnight.)	yes
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The age of the detainee? (N/A if lockup is NOT used to house detainees overnight.)	yes
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The physical build and appearance of the detainee? (N/A if lockup is NOT used to house detainees overnight.)	yes
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has previously been incarcerated? (N/A if lockup is NOT used to house detainees overnight.)	yes
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The nature of the detainee's alleged offense	yes

115.154 (a)	Third-party reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of detainees?	yes
115.151 (d)	Detainee reporting	
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment ?	yes
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
115.151 (c)	Detainee reporting	
	Does that private entity or office allow the detainee to remain anonymous upon request?	yes
	Is that entity or office able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials?	yes
	Does the agency also provide at least one way for idetainees to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
115.151 (b)	Detainee reporting	
	Does the agency provide multiple ways for detainees to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
	Does the agency provide multiple ways for detainees to privately report: Retaliation by other detainees or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple ways for detainees to privately report: Sexual abuse and sexual harassment?	yes
115.151 (a)	Detainee reporting	
	and criminal history? (N/A if lockup is NOT used to house detainees overnight.)	

	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment in its lockups?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a detainee?	yes
115.161 (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 an agency lockup?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against detainees or staff who reported such an incident?	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
115.161 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, do 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, and investigation decisions?	yes
115.161 (c)	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
115.161 (d)	Staff and agency reporting duties	
	Does the agency report all allegations of sexual abuse, including third-party and anonymous reports, to the agency's designated investigators?	yes
115.162	Agency protection duties	

(a)		
	When the agency learns that a detainee is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the detainee?	yes
115.163 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that a detainee 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
115.163 (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
115.163 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.163 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in	yes
	accordance with these standards?	
115.164 (a)		
	accordance with these standards?	yes
	accordance with these standards?  Staff first responder duties  Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to	yes

	defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	
	Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement 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
115.164 (b)	Staff first responder duties	
	If the first staff responder is not a law enforcement staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify law enforcement staff?	yes
115.165 (a)	Coordinated response	
	Has the agency 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 a lockup incident of sexual abuse?	yes
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law and unless the victim requests otherwise, inform the receiving facility of the incident and the victim's potential need for medical or social services?	yes
115.165 (b)	Coordinated response	
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the receiving facility of the incident unless the victim requests otherwise? (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.)	yes
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the	yes

	receiving facility of the victim¹s potential need for medical or social services unless the victim requests otherwise?  (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.)	
115.166 (a)	Preservation of ability to protect detainees from contabusers	tact with
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.167 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.167 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.167 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees or staff who have reported sexual abuse?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees who were reported to have suffered sexual abuse?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Act promptly to remedy any such retaliation?	yes
115.167 (d)	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
115.171 (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 115.121(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 115.121(a).)	yes
115.171 (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 115.134?	yes
115.171 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

115.171 (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
115.171 (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 detainee or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.171 (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
115.171 (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
115.171 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.171 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.171(f)	yes

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	and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	
115.171 (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 lockup or agency does not provide a basis for terminating an investigation?	yes
115.171 (l)	Criminal and administrative agency investigations	
	When outside agencies investigate sexual abuse, does the agency 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 115.121(a).)	na
115.172 (a)	Evidentiary standard for administrative investigation	s
	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
115.176 (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
115.176 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.176 (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

115.176 (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: o 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
115.177 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with detainees?	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
115.177 (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 detainees?	yes
115.178 (a)	Referral for prosecution for detainee-on-detainee sex	cual abuse
	When there is probable cause to believe that a detainee sexually abused another detainee in a lockup, does the agency refer the matter to the appropriate prosecuting authority?	yes
115.178 (b)	Referral for prosecution for detainee-on-detainee sex	cual abuse
	If the agency itself is not responsible for investigating allegations of sexual abuse, does the agency inform the investigating entity of this policy? (N/A if the agency/facility is responsible for administrative and criminal investigations. See	na

	115.121(a).)	
115.182 (a)	Access to emergency medical and mental health services	
	Do detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment?	yes
115.182 (b)	Access to emergency medical and mental health serv	ices
	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
115.186 (a)	Sexual abuse incident reviews	
	Does the lockup 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
115.186 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.186 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors and investigators?	yes
115.186 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or was motivated or otherwise caused by other group dynamics at the lockup?	yes
	Does the review team: Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in	yes

	the area may enable abuse?	
	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 §§ 115.186(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the lockup head and agency PREA coordinator?	yes
115.186 (e)	Sexual abuse incident reviews	
	Does the lockup implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.187 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions?	yes
115.187 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.187 (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 Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice, or any subsequent form developed by the Department of Justice and designated for lockups?	yes
115.187 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes

115.187 (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 detainees? (N/A if the agency does not contract for the confinement of its detainees.)	na
115.187 (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
115.188 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.187 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 § 115.187 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 § 115.187 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 lockup, as well as the agency as a whole?	yes
115.188 (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
115.188 (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	yes

115.401 (b)	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 (a)	Frequency and scope of audits	
	Does the agency maintain sexual abuse data collected pursuant to § 115.187 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.189 (d)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.189 (c)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from lockups under its direct control and any private agencies 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
115.189 (b)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.187 are securely retained?	yes
115.189 (a)	Data storage, publication, and destruction	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup?	yes
115.188 (d)	Data review for corrective action	
	does not have one, through other means?	

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

single facility agencies, there has never been a Final Audit Report issued.)	
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